



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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Mitigated Negative Declaration (MND) for the Proposed Prairie Station Apartments Project (Proposed Project)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The City of Inglewood is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. The following comments include recommended health risk reduction strategies that the Lead Agency should incorporate in the Final MND.

South Coast AQMD Staff's Summary of Project Information in the MND

Based on the MND, the Lead Agency proposes constructing three podium-style apartment buildings providing 440 units, including up to 105 with mezzanines.¹ Each of the buildings would have one or two floors of parking at grade or partially subterranean and include six stories of residential units and mezzanines located within the units on the top floor.² The Proposed Project is located on the southeast corner of the intersection of Prairie Avenue and 113th Street along the southern border of the City of Inglewood.³ The Proposed Project's construction would have a total of 440 hauling truck trips for the demolition and 4,500 hauling truck trips for the excavation activities.⁴ Based on a review of aerial photographs, South Coast AQMD staff found that the Proposed Project is located within 200 feet northeast of Interstate I-105, and the nearest sensitive receptor (e.g., residences) is adjacent to the north of the Proposed Project site. The Proposed Project's construction would last approximately 27 months, with activities beginning in January 2024 and completion expected in spring 2026.⁵

South Coast AQMD Staff's Comments

Health Risk Strategies Reductions

Notwithstanding the court rulings, South Coast AQMD staff recognizes that the Lead Agency that approves CEQA documents retain the authority to include any additional information they deem

¹ MND. Page 2-1.

² *Ibid.*

³ *Ibid.*

⁴ *Ibid.* Page 2-7.

⁵ *Ibid.*

relevant to assessing and mitigating the environmental impacts of a project. Because South Coast AQMD staff is concerned about the potential public health impacts of siting sensitive populations within proximity of sources of air pollution (e.g., freeway), it is recommended that, prior to approving future development projects, the Lead Agency consider the impacts of air pollutants on people who will live in a new project and provide mitigation where necessary. Additionally, South Coast AQMD staff suggests that the Lead Agency review the California Air Resources Board (CARB) Air Quality Land Use and Handbook: A Community Health Perspective⁶ as it is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process with additional guidance on strategies to reduce air pollution exposure near high-volume roadways available in CARB's technical advisory.⁷

Many strategies are available to reduce exposures, including, but not limited to, building filtration systems with MERV 13 or better. In some cases, MERV 15 or better is recommended, for building design, orientation, location, vegetation barriers, landscaping screening, etc. Enhanced filtration units are capable of reducing exposures. However, enhanced filtration systems have limitations. For example, in a study that South Coast AQMD conducted to investigate filters,⁸ a cost burden is expected to be within the range of \$120 to \$240 per year to replace each filter panel. The initial start-up cost could substantially increase if an HVAC system needs to be installed and if standalone filter units are required. Installation costs may vary, including costs for conducting site assessments and obtaining permits and approvals before filters can be installed. Other costs may include filter life monitoring, annual maintenance, and training for conducting maintenance and reporting. In addition, because the filters would not have any effect unless the HVAC system is running, there may be increased energy consumption that the Lead Agency should evaluate in the EIR. It is typically assumed that the filters operate 100 percent of the time while residents are indoors, and the environmental analysis does not generally account for the times when the residents have their windows or doors open or are in common space areas of the project. These filters have no ability to filter out any toxic gases. Furthermore, when used filters are replaced, the replacement has the potential to result in emissions from the transportation of used filters at disposal sites and generate solid waste that the Lead Agency should evaluate in the Draft EIR. Therefore, any filtration unit's presumed effectiveness and feasibility should be carefully evaluated in more detail before assuming they will sufficiently alleviate exposure to diesel particulate matter emissions.

Conclusion

According to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process. Please provide South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When the Lead Agency's position is at variance with recommendations raised in the comments, the issues raised in the comments should be addressed in detail, giving reasons why specific comments and suggestions are not accepted. There should be good faith and reasoned analysis in response. Conclusory statements unsupported by factual information do not facilitate the purpose and goal of CEQA on public disclosure and

⁶ California Air Resources Board (CARB) Air Quality Land Use and Handbook: A Community Health Perspective. Access at: <https://www.arb.ca.gov/ch/handbook.pdf>.

⁷ CARB's technical advisory can be found at: <https://www.arb.ca.gov/ch/landuse.htm>

⁸ This study evaluated filters rated MERV 13 or better. Accessed at: <http://www.aqmd.gov/docs/defaultsource/ceqa/handbook/aqmdpilotstudyfinalreport.pdf>. Also see 2012 Peer Review Journal article by South Coast AQMD: <https://onlinelibrary.wiley.com/doi/10.1111/ina.12013>

are not meaningful, informative, or useful to decision-makers and the public who are interested in the Proposed Project.

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Danica Nguyen, Air Quality Specialist, at dnguyen1@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

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Planning, Rule Development, and Implementation

SW:DN

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