



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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Draft Environmental Impact Report (EIR) for the Proposed Crossings Campus Project (Proposed Project) (SCH No.: 2021110079)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The City of Culver City is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. The following comments include recommended revisions to the CEQA regional air quality impacts analysis for cleanup activities during construction.

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

Based on the Draft EIR, the Proposed Project consists of demolition of single-story warehouses and surface parking lots and construction and operation of two buildings with subterranean parking totaling approximately 536,000 square feet on an approximately 4.46-acre site.¹ The Proposed Project is located on the northeast corner of National Boulevard and Washington Boulevard in the City of Culver City and in the City of Los Angeles. A Phase I Environmental Site Assessment (ESA) noted that a former gasoline service station site is located within 200 feet of the Proposed Project and that the former gasoline service station site was investigated and remediated for fuel that leaked from tanks.² Construction of the Proposed Project is anticipated to begin in the first quarter of 2023 and last approximately three years.³

South Coast AQMD Staff's Comments on the Draft EIR

CEQA Regional Air Quality Impacts Analysis for Cleanup Activities During Construction

Based on the Hazards and Hazardous Materials Section in the Draft EIR, Phase I ESA site investigation results indicated that elevated concentrations of components of gasoline and perchloroethylene (PCE) have been detected in the groundwater at the former gasoline service station site near the Proposed Project site and that such contamination has reportedly migrated generally to the Proposed Project site.⁴ Soil sampling investigations were thus conducted at the Proposed Project site to evaluate current conditions. This process showed that soil at the Proposed Project site may contain concentrations of gasoline components and PCE that are above the acceptance criteria for a receiving site or disposal facility.⁵ To accommodate the subterranean parking for the Proposed Project, during construction fill and soil would be excavated and removed from under the current buildings to a depth of about 50 feet. Such soil would then be reused or disposed of offsite.⁶ It is unclear in the Draft EIR, however, if the Lead Agency completely analyzed air quality impacts from such soil cleanup activities.

¹ Draft EIR. Executive Summary. Page ES-1.

² *Ibid.* Hazardous and Hazardous Materials. Page 4.7-20.

³ *Ibid.* Project Description. Page 2-18.

⁴ *Ibid.* Hazardous and Hazardous Materials. Page 4.7-19 through 4.7-20.

⁵ *Ibid.* Page 4.7-23 through 4.7-25.

⁶ *Ibid.* Page 4.7-25.

Since cleanup activities could include the removal and disposal of contaminated soil, and depending on the type of contamination, contaminated soil may not be accepted at the landfill site 30 miles away from the Proposed Project site,⁷ such soil may need to be disposed of at a permitted hazardous disposal facility outside Los Angeles County with a one-way truck trip length that is longer than 30 miles. If it is reasonably foreseeable at the time of the release of the Draft EIR that the Proposed Project would likely involve remediation of contaminated soil, the Lead Agency should use good faith, best efforts to provide information on the scope, types, and duration of any reasonably foreseeable soil remedial or mitigation activities, quantify emissions from those activities, and include those emissions in the Proposed Project's regional construction emissions profile to be compared to South Coast AQMD's regional air quality CEQA significance thresholds for construction to determine the level of significance in the Final EIR. If those emissions are not included in the Final EIR, the Lead Agency should provide reasons for not including them supported by substantial evidence in the record. If the reason for not including them in the Final EIR is because remedial or mitigation measures have not been fully developed or approved prior to the certification of the Final EIR, the Lead Agency should commit to evaluating the air quality impacts from those activities through a CEQA process when the measures become known and prior to allowing the commencement of any soil remedial or mitigation activities at the Proposed Project.

Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), South Coast AQMD staff requests that the Lead Agency provide South Coast AQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, 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, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and to 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 Evelyn Aguilar, Air Quality Specialist, at eaguilar@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

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Planning, Rule Development & Implementation

SW:EA

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⁷ *Ibid.* Air Quality. Page 4.2-41.