



South Coast Air Quality Management District

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Draft Mitigated Negative Declaration (Draft MND) for the Proposed Five-Story 48-Unit Apartment Project Located at 1650-1654 S. Sawtelle Boulevard in the West Los Angeles Area of the City of Los Angeles (ENV-2014-2848)

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final CEQA document.

Project Description

In the project description, the Lead Agency proposes to demolish one multi-family building and a retail store currently located on a portion of an adjoining, two-lot project site. After demolition, construction of a five-story, approximately 42,095 square foot, 48-unit apartment building will begin that would include three subterranean levels of parking with 66 spaces for vehicles and 53 spaces for bicycles. Details including the amount of excavation and soil to be exported from digging out the subterranean garage were not described in the Draft MND. The approximate project start date, phasing and project completion date were also not included in the Draft MND.

Air Quality Analyses

The Lead Agency has determined that project air quality impacts would result in less than significant impacts during construction and operation activities but did not quantify short- or long-term air quality emissions. Without quantifying project air quality impacts, the Lead Agency has not demonstrated that the proposed project will not generate significant adverse construction or operational air quality impacts that may trigger further analysis pursuant to the California Environmental Quality Act. Therefore, the SCAQMD recommends that the Lead Agency demonstrate that project impacts are less than significant in the Final MND by estimating short- and long-term air quality impacts using the current California Emission Estimator Model (CalEEMod)¹. CalEEMod is a

¹ <http://www.aqmd.gov/home/regulations/ceqa/air-quality-modeling>

statewide land use emissions model that can quantify potential project criteria pollutant and greenhouse (GHG) emissions. The Lead Agency can also estimate project emissions by following the calculation methodologies in Chapter 9 and the Appendix to Chapter 9 in the South Coast SCAQMD's CEQA Air Quality Handbook².

It is also recommended that the Lead Agency evaluate localized air quality impacts since it is noted in an aerial map inspection and in the environmental settings section on page three that the proposed project is located within one-quarter mile of sensitive receptors (residential properties) east of the project site. Therefore, the SCAQMD requests that the Lead Agency evaluate localized air quality impacts to ensure that any nearby sensitive receptors are not adversely affected by the construction activities that are occurring in close proximity. SCAQMD guidance for performing a localized air quality analysis can also be found at the SCAQMD website³. Should the Lead Agency conclude after its analyses that construction or operational air quality impacts exceed the SCAQMD daily significance thresholds, staff has compiled mitigation measures⁴ to be implemented if the air quality impacts are determined to be significant.

CARB Guidance for Siting Sensitive Receptors Near Freeways

In the Draft MND, the proposed residences will be sited near the Interstate Highway 405 (I-405). Based on an aerial map inspection, project residents would be less than 500 feet west of the freeway, of which I-405 has an average daily traffic volume of 314,000 vehicles⁵, which includes diesel trucks. Because of the close proximity to the existing freeway, residents would be exposed to diesel particulate matter, which is a toxic air contaminant.

Numerous health studies have demonstrated the potential adverse health effects of living near highly travelled roadways. As a result of these studies, the California Air Resources Board (CARB) recommended in 2005 avoiding the siting of housing within 500 feet of a freeway in their Land Use Handbook.⁶ Since the time of that study, additional research has continued to build the case that the near roadway environment also contains elevated levels of many pollutants that adversely affect human health, including some pollutants that are unregulated (e.g., ultrafine particles) and whose potential health effects are still emerging.⁷

² <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>

³ <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>

⁴ <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>

⁵ California Department of Transportation – Traffic Counts

Accessed at: <http://traffic-counts.dot.ca.gov/2013all/Route280-405.html> at Los Angeles/Wilshire Blvd, 314,000 Average Daily Vehicle Traffic.

⁶ California Air Resources Board. April 2005. "Air Quality and Land Use Handbook: A Community Health Perspective."

Accessed at: <http://www.arb.ca.gov/ch/landuse.htm>

⁷ See Chapter 9 of the 2012 AQMP for further information

Accessed at: [http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2012-air-quality-management-plan/final-2012-aqmp-\(february-2013\)/chapter-9-final-2012.pdf](http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2012-air-quality-management-plan/final-2012-aqmp-(february-2013)/chapter-9-final-2012.pdf).

The SCAQMD staff therefore recommends that the Final MND include an evaluation of the potential health risks to future residents by preparing a Health Risk Assessment (HRA). The unmitigated results should then be compared with recognized significance thresholds along with the effectiveness of the proposed mitigation described on page two and include those results in the Final CEQA document in order to demonstrate the Lead Agency's determination that potential adverse air quality impacts from freeway traffic to potential residents are less than significant.

Limitations to the Effectiveness of Filters as Mitigation

Using the proposed air filters as mitigation has limitations. It should be noted that these filters have no ability to filter out any toxic gasses from vehicle exhaust and residents will not be protected outside of their homes while relaxing outside, playing in a common area, washing a vehicle or when the windows or doors are open. Further, the heating, ventilation and air conditioning (HVAC) system and as well as the filters have to be serviced/replaced as required by manufacturer recommendations with annual replacement costs expected to range from \$120 to \$240 to replace each filter⁸. Adequate pressure must also be maintained within the residences and it is assumed that the filters will operate 100 percent of the time while residents are indoors.

Compliance With SCAQMD Rule 1403 During Demolition/Renovation Activities

Besides estimating construction and operational air quality impacts, the Lead Agency should also describe compliance with SCAQMD Rule 1403 - Asbestos Emissions from Demolition/Renovation Activities due to the potential of discovering asbestos during the demolition activities described in the project description.

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final MND. The SCAQMD staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

⁸ <http://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf?sfvrsn=0> . This study evaluated filters rated MERV 13+ while the proposed mitigation calls for less effective MERV 12 or better filters. See also CARB link for the "Status of Research on Potential Mitigation Concepts to Reduce Exposure to Nearby Traffic Pollution" (August 23, 2012): http://www.arb.ca.gov/db/search/search_result.htm?q=Potential+Mitigation+Concepts+to+Reduce+Exposure+to+Nearby+Traffic+Pollution&which=arb_google&cx=006180681887686055858%3Abew1c4wl8hc&srch_words=&cof=FORID%3A11 .

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Sincerely,

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