



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) for the Proposed Residential Dwelling Located at 1715 N. Bronson Ave.; Hollywood (ENV-2014-3610)

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. In the project description, the Lead Agency proposes to demolish two multi-family apartment buildings totaling 38,000 square feet, grade and export 28,500 cubic yards of soil, and construct a 89-unit apartment building. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final IS/MND.

In the Draft MND, the Lead Agency notes that the proposed residences will be sited near the Highway 101. These residences would be approximately 75 feet southwest of the freeway, of which Highway 101 has an average daily traffic volume of 213,000 vehicles¹, 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. The Lead Agency prepared a Health Risk Assessment (HRA). However, Appendix B and the electronic modeling files were not made available to SCAQMD staff for review.

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 recommended in 2005 avoiding the siting of housing within 500 feet of a freeway in their Land Use Handbook.² 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.³

The Lead Agency has determined that estimated construction emissions are less than the SCAQMD recommended thresholds of significance during construction. The SCAQMD staff has concerns about the assumptions used in the modeling to estimate regional, localized and health effect impacts. Additional details are included in the attachment.

¹California Department of Transportation – Traffic Counts

Accessed at: <http://traffic-counts.dot.ca.gov/2013all/>

²California 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>

³See Chapter 9 of the 2012 AQMP for further information

Accessed at: <http://www.aqmd.gov/aqmp/2012aqmp/Final-February2013/Ch9.pdf>

The SCAQMD staff is available to work with the Lead Agency to address these concerns and any other air quality questions that may arise. Please contact Jack Cheng, Air Quality Specialist at (909) 396-2448, if you have any questions regarding these comments. We look forward to reviewing and providing comments for the Final IS/MND associated with this project.

Sincerely,

Jillian Wong

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JW:JC

LAC 150219-06

Control Number

ATTACHMENT

Air Quality Analysis – Construction

1. Appendix A - Modeling, estimates that 38,000 square feet of multi-family building space will be demolished and 173 haul trips will be required to remove demolition debris. It is unclear how these assumptions were calculated and the SCAQMD staff recommends that additional information be provided in the Final MND.
2. Emissions generated from grading and excavation haul trucks are not included in the air quality modeling. The SCAQMD staff recommends that the Lead Agency include the emissions from excavation haul trucks and update the Air Quality Analysis in the Final MND.

Health Risk Assessment (HRA)

3. The Lead Agency used AERMOD version 14134 to perform the dispersion modeling, however, the meteorological dataset was outdated. SCAQMD staff recommends that the Lead Agency revise the modeling using the most recent meteorological data processed with AERMET version 14134.
4. In the modeling performed for the project, the Lead Agency use the non-default option of FLAT and FASTALL. According to SCAQMD's modeling guidance, the use of non-default options is not recommended without prior consultation with SCAQMD staff. Furthermore, the segment of freeway is below grade when compared to the project, therefore, the use of the FLAT option might have caused health risks to be underestimated. SCAQMD staff recommends that the Lead Agency revise the dispersion modeling in the HRA using the default options including elevations.
5. The Lead Agency did not provide Appendix B nor the electronic modeling files for SCAQMD staff to review. As such, SCAQMD staff was unable to verify the accuracy of the impacts from the HRA. Furthermore, there was no information in the Draft MND to explain how the emission rates and cancer risks were calculated and SCAQMD staff cannot be certain that the cancer risk estimates included in the Draft MND were calculated correctly.

Mitigation During Operations (MERV Filters and HVAC Systems)

6. While the health science behind recommendations against placing new homes close to freeways is clear, SCAQMD staff recognizes the many factors lead agencies must consider when siting new housing. Further, many mitigation measures have been proposed for other projects to reduce exposure, including building filtration systems, sound walls, vegetation barriers, etc. However, because of the potential health risks involved it is critical that any proposed mitigation must be carefully evaluated prior to determining if those health risks would be brought below recognized significance thresholds.

Limits to Enhanced Filtration Units

7. The lead agency should consider the limitations of the proposed mitigation for this project (enhanced filtration) on housing residents. For example, in a study that SCAQMD conducted to investigate filters⁴ similar to those proposed for this project, costs were expected to range from \$120 to \$240 per year to replace each filter. In addition, because the filters would not have any effectiveness unless the HVAC system is running, there may be increased energy costs to the resident. The proposed mitigation assumes that the filters operate 100 percent of the time while residents are indoors. These filters also have no ability to filter out any toxic gases from vehicle exhaust. The presumed effectiveness and feasibility of this mitigation should therefore be evaluated in more detail prior to assuming that it will sufficiently alleviate near roadway exposures.

⁴ This study evaluated filters rated MERV 13+ while the proposed mitigation calls for less effective MERV 6 or better filters. Accessed at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf?sfvrsn=0>.