



South Coast Air Quality Management District

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Draft Mitigated Negative Declaration (Draft MND) for the Proposed 469 N. Grand Ave; Central City (ENV- 2013-3549)

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 MND.

The Lead Agency proposes to develop a mixed-use project with 299 dwelling units, commercial retail space and subterranean parking. The existing fast food establishment would be demolished. Since the project includes demolition, the Lead Agency should discuss and provide additional information regarding compliance with SCAQMD Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities in the Final MND. Additionally, the Limited Sited Assessment found the presence of soil and groundwater contamination from a former gasoline service station. Disturbing soils that contain petroleum hydrocarbons are subject to the requirements of SCAQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil and a discussion of compliance with Rule 1166 should be included in the Final MND. Furthermore, the Final MND should discuss how the project will comply with SCAQMD Rule 402 – Public Nuisance.

The proposed project is also adjacent to sensitive land uses¹ (i.e., school to the southeast); however, the Draft MND did not evaluate potential localized air quality impacts resulting from construction of the proposed project. Therefore, the SCAQMD staff recommends that the Lead Agency revise the air quality analysis to include an assessment of potential localized air quality impacts during demolition and construction of the proposed project. These potential air quality impacts should be analyzed using SCAQMD's Localized Significance Methodology².

In the Draft MND, the Lead Agency notes that the proposed residences will be sited near the Route 101 and 110 freeways. These residences would be approximately 250 feet northeast of the freeway³, of which Route 101 has an average daily traffic volume of 276,000 vehicles, which includes more than 8,700 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 SCAQMD staff therefore recommends that the Lead Agency conduct a mobile source health risk assessment (HRA)⁴ to disclose the potential health risks to the residents from vehicles that use the freeway including diesel-fueled vehicles that emit diesel particulate matter, which the California Air Resources Board (CARB) has determined to be carcinogenic.

¹ 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>

² The Localized Significance Threshold (LST) methodology and Mass Rate LST Look Up Table is available at: <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>

³ Aerial map inspection.

⁴ "Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis" Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>

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.⁵ 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.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

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 filters⁷ 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 and does not account for the times when the residents have their windows or doors open or are in common space areas of the project. These filters also have no ability to filter out any toxic gasses 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.

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 MND associated with this project.

Sincerely,

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⁵ 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>

⁶ See Chapter 9 of the 2012 AQMP for further information

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

⁷ This study evaluated filters rated MERV 13+ while the proposed mitigation calls for less effective MERV 12 or better filters.

Accessed at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf>.