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**Draft Environmental Impact Report (EIR) for the Proposed
Radford Studio Center Project (Proposed Project)
(SCH No.: 2023060056)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The City of Los Angeles is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff (Staff) has provided a brief summary of the project information and prepared the following comments organized by topic of concern.

Summary of Project Information in the Draft EIR

Based on the Draft EIR, the Proposed Project would continue the use of an existing studio while concurrently modernizing and expanding the media production facilities within the approximately 55-acre site.¹ According to the Project Description, the net change or increase is 1,020,890 square feet.² In addition, the Proposed Project would include the construction of a new multi-modal bridge known as the Radford Bridge.³ The Proposed Project is located at 4024, 4064, and 4200 North Radford Avenue, within the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan area of the City of Los Angeles.⁴ Based on a review of aerial photographs, the nearest sensitive receptors (e.g., residential uses) appear to be 120 feet to the west and east of the Proposed Project site. The Proposed Project's schedule indicates construction could either occur during one concentrated phase spanning approximately 39 months with completion by 2028,⁵ or multiple phases over 20 years with full buildout by 2045.⁶

South Coast AQMD Comments

Clarification/Revision Regarding the Regional Construction Impact Analysis

As outlined in the Project Description of the Draft EIR, the Proposed Project includes the construction of a new multi-modal bridge, the Radford Bridge,⁷ which "... is expected to be

¹ Draft EIR, p.II-16.

² *Ibid.* p. II-17.

³ *Ibid.* p. II-35.

⁴ *Ibid.* p. II-2.

⁵ *Ibid.* p. II-53.

⁶ *Ibid.* p. II-53.

⁷ *Ibid.* p. II-35.

*constructed following the relocation of the trunk line along Moorpark Street and associated infrastructure improvements by LADWP.*⁸ However, the Draft EIR does not appear to provide the emission calculations of the Radford Bridge construction for the compressed construction timeline between 2025 and 2028 or the extended construction timeline between 2025 and 2045. To address this concern, the Lead Agency is recommended to revise the Draft EIR to either 1) identify where the emissions calculations associated with the Radford Bridge construction have been included in the regional construction analysis or 2) calculate the construction emissions calculations associated with the Radford Bridge construction and update the construction analysis accordingly in the Final EIR.

Potential Overlapping Construction and Operation Phases

The Proposed Project has two different timeline options for when construction will occur: a compressed timeline with construction activities occurring between 2025 and 2028⁹ and an extended construction timeline with construction activities occurring between 2025 and 2045.¹⁰ Due to the extensive nature of the Proposed Project's various components, some aspects of the construction activities may be completed sooner than others, which would mean that there could be a potential overlap of ongoing construction activities with the operation of various elements of the Proposed Project. However, the Draft EIR only addresses the potential overlap of construction and operation occurring between the years 2028 and 2030 as part of the extended buildout scenario with the 2045 end date. Therefore, the Lead Agency is recommended to update the construction air quality analysis and calculations in the Draft EIR to address the potential overlap with operation activities for the period between 2025 and 2028. Further, since the Draft EIR appears to rely on the South Coast AQMD air quality significance thresholds for determining whether the construction and operation emissions are significant for any overlap of construction and operation activities that may occur for the period between 2025 and 2028, the analysis should add the construction and operation emissions and compare that total to the South Coast AQMD air quality significance thresholds for operation.¹¹

Recommend Revisions to the Regional Operational Air Quality Impact Analysis

The Draft EIR indicates that the Proposed Project includes 12 existing diesel-powered emergency generators, five of which would be replaced with four new units.¹² According to the supplemental technical files provided by the Lead Agency, which contain the emission calculations for the emergency generators, a 15-minute duration was relied upon to quantify emissions for both the baseline emissions for the 12 existing emergency generators as well as the seven existing emergency generators plus four new emergency generators post-project. While using future permitted conditions may be relied upon for calculating the emissions that will occur once the Proposed Project is operational, when calculating baseline emissions, however, CEQA case law says the analysis cannot use permitted capacity and, instead, the analysis must measure impacts against actual existing conditions.¹³ Thus, the Lead Agency is recommended to revise the baseline

⁸ *Ibid.* p. II-32.

⁹ *Ibid.* p. IV.B-62

¹⁰ *Ibid.* p. IV.B-91. Table IV.B-14.

¹¹ South Coast AQMD Air Quality Significance Thresholds available at <http://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf>

¹² *Ibid.* p. IV.B-86.

¹³ *Communities for a Better Environment v. South Coast AQMD*, (2010) 48 Cal 4th 310 (“ConocoPhillips”)

emission calculations for the 12 existing emergency generators to reflect actual operating conditions. For quantifying the future operation emissions of the remaining seven existing emergency generators and the four new emergency generators, the calculations can rely upon the permit conditions. It is important to note that South Coast AQMD air permits issued for emergency engines typically allow up to 50 hours per year for maintenance and testing, with a maximum of 200 total operational hours per year (including emergency use). As a result, the analysis of operational emissions for these four new emergency generators should calculate the future emissions based on the assumption of 200 hours of operation per year per unit. If fewer hours are assumed for either the remaining seven existing emergency generators or the four new emergency generators, South Coast AQMD staff would need to include a permit condition to limit operations of these emergency generators to the hours specified in the CEQA analysis. Therefore, it is recommended that the Lead Agency revise the emissions calculations for the emergency generators that will be operating post-project to reflect the maximum allowable usage. These revisions should be incorporated into the analysis of operation emissions and the level of significance should be re-examined and updated accordingly. The revised calculations and supporting evidence should be included in the Final EIR.

Localized Significance Threshold Analysis During Construction and Operation

The localized significance threshold (LST) analysis in the Draft EIR appears to incorrectly rely on the LST screening tables to determine the significance of localized air quality impacts. As indicated in Table 3-2 of the LST methodology,¹⁴ these screening tables are not applicable for projects larger than five acres. Since the Proposed Project site size is 55 acres and is located in close proximity to sensitive receptors, including residential uses to the west and east, as noted earlier in this letter, reliance on the LST screening tables may underestimate localized air quality impacts. Therefore, it is recommended that the Lead Agency conduct project-specific dispersion modeling to assess the localized air quality impacts from both the construction and operational phases of the Proposed Project accurately and include the results in the Final EIR.

Clarification Regarding the Number of Truck Trips per Day

Based on the supplemental technical files provided by the Lead Agency, the future trips estimated in the spreadsheet labeled “Mobility Hub” include 277 diesel truck trips, consisting of 189 light-duty trucks (LDTs), 54 medium-duty trucks (MDTs) and 34 heavy-duty trucks (HDTs),¹⁵ resulting in a net increase of 152 truck trips compared to the existing trips. However, the Draft EIR does not include information regarding the number of daily truck trips required to support the Proposed Project’s operation. In addition, the California Emissions Estimator Model (CalEEMod) output files of the Project buildout¹⁶ only provide the total trips for all land uses but do not specifically identify how many trips are attributed to trucks. Therefore, the Lead Agency is recommended to provide details on the daily truck trips in the Final EIR and its appendices.

¹⁴ South Coast AQMD Final Localized Significance Threshold Methodology available at <https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf>

¹⁵ Provided technical files. Mobility Hub spreadsheet.

¹⁶ Appendix D_Air Quality and Greenhouse Gas. CalEEMod Output Files.

Health Risk Assessment during Operation

CEQA Guidelines Sections 15126.2 and 15126.4 require an EIR to describe the significant environmental effects of a proposed project, including avoidable adverse impacts, significant irreversible changes, growth-inducing impacts, and proposed mitigation measures to minimize adverse impacts. Under CEQA, an impact is considered significant if it results in a “substantial, or potentially substantial, adverse change in the environment.”

The Proposed Project involves a substantial expansion of facility operations, including the introduction of new equipment, modifications or relocations of existing equipment, removal of certain units, and the net site increase of 1,020,890 square feet.¹⁷ The Draft EIR identifies a substantial increase in criteria pollutant emissions, and the localized air quality impacts would be potentially significant. However, the Draft EIR appears to exclude any meaningful analysis of potential adverse health risk impacts from the Proposed Project. The health risks and emissions from these new and modified stationary sources, specifically regarding toxic air contaminants (TACs), may also be substantial.

Based on the South Coast AQMD Facility Information Detail (F.I.N.D) database for this facility (Facility ID: 101520),¹⁸ the existing facility includes more than 10 on-site permitted sources, including but not limited to spray booths, natural gas charbroilers, and emergency diesel-fueled engines, some of which are proposed to be relocated elsewhere within the facility site. Additionally, as stated in Section IV-B (Air Quality), the facility currently operates 16 existing emergency generators, 12 of which are diesel-fueled. The Proposed Project intends to replace five existing diesel-fueled emergency generators with four new diesel-fueled emergency generators,¹⁹ each rated at 2,000 kilowatts (kW),²⁰ which will require air permits from South Coast AQMD.²¹ However, the Draft EIR does not identify where these new diesel-fueled emergency generators will be located within the facility. Moreover, as noted earlier in this letter, sensitive receptors (residential areas) are located 120 feet to the west and east of the Proposed Project site. If the four new diesel-fueled emergency generators are positioned closer to these sensitive receptors than the original generators, this could potentially increase health risks due to diesel particulate matter (DPM), a TAC, and a carcinogen. In addition, an increase in truck trips associated with the Proposed Project will further contribute to the DPM emissions at the facility.

Upon review of the Draft EIR and its appendices, it is noted that while DPM emissions from the trucks and diesel-fueled emergency generators were quantified, their associated health risks were not analyzed. It is essential that the Final EIR includes a qualitative and/or quantitative health risk assessment for the operational phase, given the following factors associated with the Proposed Project:

- High horsepower of four new diesel-fueled emergency generators to be operated onsite combined with the seven existing diesel-fueled emergency generators, which will continue to operate at the facility;

¹⁷ *Ibid.* p. II-17.

¹⁸ South Coast AQMD Facility Information Detail (F.I.N.D) database:
<https://xapprod.aqmd.gov/find/facility/AQMDsearch?facilityID=101520>

¹⁹ *Ibid.* p. IV.B-86.

²⁰ *Ibid.* p. IV.B-86.

²¹ *Ibid.* p. IV.B-86.

- The proposed increase in the number of diesel-fueled trucks that will be visiting the facility as indicated in the Mobility Hub spreadsheet and the uncertain number of truck trips related to project operations; and
- The close proximity of residential sensitive receptors.

As such, the assessment should focus on evaluating the maximum increased cancer risk impact on the nearest sensitive receptors. At a minimum, a qualitative analysis should be conducted that:

- Inventories and evaluates all stationary sources (including permitted, proposed, and planned future units) and mobile sources;
- Identifies the locations of the stationary sources, truck routes, truck loading/unloading docks (if applicable), and their proximity to sensitive receptors under both existing and foreseeable future conditions and
- Provides supporting evidence to determine whether the Proposed Project could result in potentially substantial health risk impacts to the sensitive receptors.

If a qualitative analysis is not performed, the Final EIR should include a discussion explaining the rationale along with substantial evidence. If the qualitative analysis suggests that the Proposed Project may pose potentially significant adverse health risks, a quantitative health risk assessment (HRA) should be conducted, which:

- Compares the increased cancer risks associated with the Proposed Project to the South Coast AQMD CEQA significance threshold of 10 in one million²² to determine the significance of the health risks; and
- Discloses the potential chronic and acute health risks to residents living and workers employed outside the Proposed Project boundary and compares the total project incremental health risks to the South Coast AQMD CEQA significance threshold for chronic and acute hazard index in the Final EIR.

If an HRA is not conducted, the Lead Agency should provide substantial evidence justifying its exclusion.

South Coast AQMD Air Permits and Role as a Responsible Agency

The Proposed Project would require the use of existing and new stationary sources, including but not limited to emergency generators, spray booths, etc., for which air permits from South Coast AQMD will be required. The Final EIR should include a discussion about the South Coast AQMD rules that may be applicable to the Proposed Project. Those rules may include, for example, Rule 201 – Permit to Construct,²³ Rule 203 – Permit to Operate,²⁴ Rule 401 – Visible Emissions,²⁵ Rule 402 – Nuisance,²⁶ Rule 403 – Fugitive Dust,²⁷ Rule 1110.2 – Emissions from Gaseous and Liquid-

²² South Coast AQMD Air Quality Significance Thresholds available at <http://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf>

²³ South Coast AQMD. Rule 201 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>

²⁴ South Coast AQMD. Rule 203 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>

²⁵ South Coast AQMD. Rule 401 available at <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf>

²⁶ South Coast AQMD. Rule 402 available at <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>

²⁷ South Coast AQMD. Rule 403 available at <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403>

Fueled Engines,²⁸ Rule 1113 – Architectural Coatings,²⁹ Rule 1166 – VOC Contaminated Soil Excavation,³⁰ Regulation XIII – New Source Review,³¹ Rule 1401 – Air Toxics,³² Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants,³³ Rule 1470 – Requirements for Stationary Diesel Fueled Internal Combustion and Other Compression Ignition Engines,³⁴ etc. It is important to note that when air permits from South Coast AQMD are required, the role of South Coast AQMD would change from a Commenting Agency to a Responsible Agency under CEQA. In addition, if South Coast AQMD is identified as a Responsible Agency, per CEQA Guidelines Sections 15086, the Lead Agency is required to consult with South Coast AQMD.

CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of the process for conducting a review of the Proposed Project and issuing discretionary approvals. Moreover, it is important to note that if a Responsible Agency determines that a CEQA document is not adequate to rely upon for its discretionary approvals, the Responsible Agency must take further actions listed in CEQA Guideline Section 15096(e), which could have the effect of delaying the implementation of the Proposed Project. In its role as CEQA Responsible Agency, the South Coast AQMD is obligated to ensure that the CEQA document prepared for this Proposed Project contains a sufficient project description and analysis to be relied upon in order to issue any discretionary approvals that may be needed for air permits. South Coast AQMD is concerned that the project description and analysis in its current form in the Draft EIR is inadequate to be relied upon for this purpose.

For these reasons, the Final EIR should be revised to include a discussion about any and all new stationary and portable equipment requiring South Coast AQMD air permits, provide the evaluation of their air quality and greenhouse gas impacts, and identify South Coast AQMD as a Responsible Agency for the Proposed Project as this information will be relied upon as the basis for the permit conditions and emission limits for the air permit(s). Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions regarding what types of equipment would require air permits. For more general information on permits, please visit South Coast AQMD's webpage at <https://www.aqmd.gov/home/permits>.

Conclusion

As set forth in Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a-b), the Lead Agency shall evaluate comments from public agencies on the environmental issues and prepare a written response at least 10 days prior to certifying the Final EIR. As such, please provide South Coast AQMD written responses to all comments contained herein at least 10 days prior to the certification of the Final EIR. In addition, as provided by CEQA Guidelines Section 15088(c), if the Lead Agency's position is at variance with recommendations provided in this

²⁸ South Coast AQMD. Rule 1110.2 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf

²⁹ South Coast AQMD. Rule 1113 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf>

³⁰ South Coast AQMD. Rule 1166 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>

³¹ South Coast AQMD. Regulation XIII available at <https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiii>

³² South Coast AQMD. Rule 1401 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf>

³³ South Coast AQMD. Rule 1466 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf>

³⁴ South Coast AQMD. Rule 1470 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf>

comment letter, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided.

Thank you for the opportunity to provide comments. 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,

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