



South Coast Air Quality Management District

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**Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) for the
Proposed Mixed-Use Residential and Retail Building Project Located at 233 W.
Washington Boulevard in Los Angeles (ENV-2008-386-MND)**

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.

Project Description

In the project description, the lead agency proposes to demolish the existing parking lot and construct a new 271,119 square foot, seven-story, mixed use building consisting of 160-unit residential condominium units, 24,000 square feet of ground floor commercial retail space, and a 173-space, two-level subterranean parking structure. Although excavation and soil export would likely occur during the construction phases for the proposed underground parking structure, the details surrounding the excavation and soil export were not included in the Draft MND. The project description should be revised to include any proposed excavation and soil export. The air quality impacts from these activities should also be incorporated into any applicable analysis in the Final MND.

Construction and Operation Air Quality Impacts

The SCAQMD staff is concerned that the lead agency determined that project air quality and health effect impacts were less than significant without quantifying these potentially adverse impacts in the Draft MND. In the Air Quality Section, the lead agency appears to have based its determination by using the screening tables in Chapter 6 of the SCAQMD's 1993 CEQA Air Quality Handbook (SCAQMD Handbook), which use the SCAQMD staff has not supported for a number of years because those screening tables are now outdated. In addition, the tables do not account for activities like excavation for the underground parking or locating residences near high-volume highways. As a result of relying solely on the screening tables, instead of quantifying air quality impacts, the

lead agency has failed to demonstrate 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 staff 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 recognized resources such as the current California Emission Estimator Model (CalEEMod).¹ CalEEMod is a 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 Handbook.² 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 measures³ in addition to the mitigation included in the Draft MND starting on page two of the Draft MND to be implemented if the air quality impacts are determined to be significant.

Health Risk Effects from High Volume Freeway

Because of the proximity of the proposed residential use to a high volume freeway, the SCAQMD staff recommends that the lead agency conduct a health risk assessment (HRA) to determine the health risk effects from the proposed freeway traffic that includes diesel particulate matter, a carcinogenic, from diesel fueled vehicles operating on the freeway. Specifically, the proposed project includes 160 residential condominium units and appears to be located approximately 397 feet southwest of the I-10 Freeway,⁴ which has an average daily traffic volume of 243,000 vehicles. Current guidance from the California Air Resources Board recommends avoiding siting new sensitive receptors (e.g., residences, schools, daycare centers, playgrounds, medical facilities, etc.) within 500 feet of a freeway in their Land Use Handbook⁵ to avoid this exposure.

In addition, recent research has revealed that pollutants found in close proximity to freeways are associated with a variety of adverse health effects, independent of regional air quality impacts.⁶ These can include reduced lung capacity and growth,⁷ cardiopulmonary disease;⁸ increased incidence of low birth weight, premature birth, and birth defects.⁹

¹ <http://www.aqmd.gov/ceqa/models.html>

² <http://www.aqmd.gov/ceqa/hdbk.html>

³ http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html

⁴ Aerial map inspection.

⁵ CARB Air Quality and Land Use Handbook: A Community Health Perspective (April 2005): <http://www.arb.ca.gov/ch/handbook.pdf>

⁶ "Special Report 17. Traffic-related air pollution: A critical review of the literature on emissions, exposure, and health effects". Health Effects Institute, May 2009; 394 p.

⁷ "Effect of exposure to traffic on lung development from 10 to 18 years of age: a cohort study". Gauderman WJ et al., Lancet, February 2007; 369 (9561): 571-7.

⁸ "Exposure to traffic and the onset of myocardial infarction". Peters A et al., The New England Journal of Medicine, 351(17):1721-1730.

⁹ Ritz B, et al. 2002 Ambient air pollution and risk of birth defects in Southern California. Am J Epidemiology, 155:17-25

Further, while the health science behind recommendations against placing new homes close to freeways is clear, the SCAQMD staff recognizes the many factors lead agencies must consider when siting new housing. 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.

Response to Comments and Contact Information

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.

Sincerely,



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