



South Coast Air Quality Management District

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July 10, 2014

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**Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) for the
Proposed 24-Unit Multi-Family Residential Building Project (ENV-2014-1664)
Located at 8435 N. Orion Avenue in North Hills**

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.

The Lead Agency proposes the construction of a new 24-unit multi-family residential apartment building on an approximate 16,425 square foot site. The building would be four stories high and include one level of subterranean parking with spaces for 47 vehicles and 27 bicycles. Approximately 6,700 cubic yards of soil is expected to be exported from the site. The proposed project's estimated toxic air emission impacts, as well as construction and operational air quality emissions were not quantified in the draft CEQA document. Rather, page 16 of the Draft IS/MND refers to potential toxic air emissions exposure and to the screening tables in the SCAQMD CEQA Air Quality Handbook (Handbook) to support its determination that project health risk effects and air quality impacts are less than significant.

Siting Sensitive Receptors Near a Freeway

Based on the Lead Agency's own estimate and an aerial map inspection, the proposed multi-residential project building would be directly adjacent to the 405 Freeway that currently carries up to 220,000 vehicles per day, therefore potentially exposing these sensitive land uses to a significant source of toxic air emissions. Although the page four of the Draft IS/MND mentions a "Freeway Adjacent Advisory Notice for Sensitive Uses", the Draft IS/MND does not discuss or evaluate the potential health risk impacts from diesel fueled vehicles on the freeway to the potential residents. The SCAQMD staff therefore recommends that the potential project health risk impacts be evaluated and included in the Final MND consistent with the SCAQMD's recommended methodology¹

¹ The SCAQMD Mobile Source HRA Guidance is available at:
<http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis> .

and applicable CEQA significance of thresholds.² If the Health Risk Assessment demonstrates significant health risk impacts, the Lead Agency should provide mitigation pursuant to Section 15126.4 of the CEQA Guidelines. In the California Air Resources Board (CARB) Land Use and Air Quality Handbook: A Community Health Perspective (CARB Handbook),³ guidance is offered for siting sensitive receptors near sources of air toxics. The CARB Handbook recommends avoiding siting new sensitive land uses within 500 feet of a freeway with 100,000 or more vehicles a day.

Air Filtration Mitigation

In siting the proposed project, the lead agency has included in the proposed project mitigation measures that have been proposed for other projects to reduce exposure including building filtration systems and vegetation barriers. Because of the potential health risks involved, however, 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.

Finally, the lead agency should also consider the limitations of the proposed mitigation for this project (air filtration system) for the residential building. 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 also assumes that the filters operate 100 percent of the time while residents are indoors. Lastly, because these filters 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.

Quantification of Regional Construction and Operation Air Quality Impacts

The lead agency also based its determination that project regional construction and operation air quality impacts are less than significant without quantifying those emissions but instead used the screening tables in Chapter 6 of the SCAQMD's 1993 CEQA Air Quality Handbook (Handbook). Because the screening tables do not take into account construction activity such as the excavation for the proposed subterranean garage, for example, and also do not consider localized air quality impacts, the SCAQMD staff recommends that the lead agency quantify the project impacts using the current California Emission Estimator Model (CalEEMod)⁵ or manually use the calculation

² SCAQMD's recommended CEQA significance thresholds for cancer risk impacts are available at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2>

³ California Air Resources Board. April 2005. "Air Quality and Land Use Handbook: A Community Health Perspective," at: <http://www.arb.ca.gov/ch/landuse.htm>

⁴ Under Other Useful Links: Pilot Study of High Performance Air Filtration for Classroom Applications at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook> .

⁵ CalEEMod: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-modeling>

methodologies in Chapter 9 and the Appendix to Chapter 9 in the SCAQMD's CEQA Air Quality Handbook⁶ to quantify these impacts. CalEEMod is a statewide land use emissions model that can quantify potential project criteria pollutant and greenhouse (GHG) emissions. 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 measures⁷ 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.

Localized Impacts

The SCAQMD staff also recommends that the lead agency evaluate localized air quality impacts since it is noted on page four in the Draft MND and in an aerial map inspection, the proposed project is located within one-quarter mile of sensitive receptors (multi-family and single-family residential properties) north, south and east of the proposed project. 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 website.⁸

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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LAC140626-04
Control Number

⁶ SCAQMD's CEQA Air Quality Handbook: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>

⁷ Mitigation Measures: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>

⁸ LST Guidance: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>