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Draft Mitigated Negative Declaration (DMND) for the Proposed Swansea Park Senior Apartments Phase 2 and Swansea Village Projects (MND-NG-16-214-PL; ENV-2014-4904) in the Hollywood Area of the City of Los Angeles

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

The Lead Agency proposes to demolish 26 dwelling units and construct two residential buildings and a parking garage that would include a total of approximately 174,399 square feet and 130 residential units. "The Swansea Park Senior Apartments Phase 2" and "Swansea Village" projects include development of a 76-unit, senior apartment building and a 54-unit four-story apartment building located on two separate contiguous parcels. The first parcel is for The Swansea Park Senior Apartments Phase 2 that is located at 5151 Romaine Street and 1005 and 1013 N. Kingsley Drive on an approximately 1.24-acre lot. This project will include demolition of six structures (totaling 16 dwelling units) totaling approximately 8,040 square feet. After demolition, a four-story, approximately 98,225 square foot, 76-unit senior apartment building that will include a three-level, 27,296 square foot garage with one-level below grade. Parking will include 83 vehicle spaces and 84 bicycle spaces. The Swansea Village site is located at 1050 N. Hobart Boulevard on an approximately 1.79-acre lot. On this site, there will be nine buildings (10 dwelling units) demolished totaling 7,770 square feet. After demolition, a four-story, approximately 48,248 square foot, 54- unit apartment building will be constructed that will include at-grade parking with 86 vehicle spaces and 60 bicycle spaces. Construction is expected to take approximately one year to complete starting approximately in late 2016 or early 2017.[1]

[1] CalEEMod out sheets, Project Phasing, pages 6-7.

Air Resource Board's Guidance for Siting Sensitive Receptors Near Freeways

Based on the proximity of the proposed residences to the nearby U.S. 101 Freeway that has a peak traffic volume of 238,000 vehicles including approximately 8,401 trucks,[2] the Lead Agency conducted a Health Risk Assessment concluding the residences would be exposed to significant adverse health impacts[3] from nearby freeway traffic without mitigation but less than significant exposure with the implementation of heating, ventilation and air conditioning (HVAC) control equipment with filtration systems that would be equal to or exceed Minimum Efficiency Reporting Values (MERV) between 8-13.

Based on numerous health studies, it has been demonstrated that there are 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.[4] Both project sites are within 500 feet of the nearby U.S. 101 Freeway. 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.[5]

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, sounds 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 filters[6] similar to those proposed for this project, costs were expected to range from $120 to $240 per year to replace each filter (the SCAQMD staff notes that the property agent would be responsible for maintaining the filter screens[7], although the maintenance costs could be passed on to the residents). 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

[2] http://www.dot.ca.gov/trafficops/census/ Caltrans 2014 Traffic, 101 Freeway at Melrose (Average Back Peak month of 238,000 daily vehicles) and Truck (101 Freeway at Edgeware, 3.53% trucks) Volumes. The peak month ADT is the average daily traffic for the month of heaviest traffic flow.

[3] DMND, Appendix C, Health Risk Assessment, Including Diesel Particulate Matter from Traffic Operating on the Adjacent US 101 Freeway.

[4] 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 .

[5] See Chapter 9 of the 2012 AQMP for further information , accessed at: http://www.aqmd.gov/aqmp/2012aqmp/Final-February2013/Ch9.pdf

[6] 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

[7] DMND, Air Quality Study, Page 12. Draft IS/MND, Mitigation Measure AQ-1, Page 34-35.

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.

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 air quality 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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