



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

March 2, 2016

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Draft Mitigated Negative Declaration (DMND) **for the Proposed Ferrante Apartments Project (ENV-2015-0490-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 CEQA document.

Project Description

The Lead Agency proposes demolition of an existing 10-story, 730,597 square foot office building, an associated parking lot, and the demolition of an adjacent four-story, 267,340 square foot parking structure. After demolition is completed, construction would begin on a seven-story, 1,814,680 square foot mixed-use building that would include 1,500 residential apartment units and 30,000 square feet of retail space. The proposed project includes construction of a five-level, parking structure for approximately 2,606 vehicles and 1,680 bicycles with four levels below grade. Excavation and soil export would result in approximately 505,000 cubic yards of soil hauling resulting in approximately 200 truck trips per day for about 170 days. The proposed project site is near the US-101 and I-110 Freeway Interchange and directly west of the I-110 Freeway. Construction is phased with the opening year scheduled for 2018.

Health Risk Assessment

In the DMND, the Lead Agency notes that the proposed residences will be sited near the Interstate 110 Freeway (I-110). These residences would be adjacent to the freeway¹, of which I-110 has an average daily traffic volume of 284,000 vehicles, which includes 6,305 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 recommends that the Lead Agency prepare a mobile source health risk assessment 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

¹ Aerial map inspection.

be carcinogenic. The SCAQMD's recommended methodology for analyzing cancer risks from mobile source diesel emissions can be found on the SCAQMD website².

CARB Advisory Guidance Recommendation to Avoid Siting Housing Near a Freeway

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.³ 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.⁴

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

On page 3-27, the Lead Agency proposes air filters (Mitigation Measure III-3) to reduce exposure to the road dust generated on the nearby roadways and freeways. First, the description of the filtration systems is incomplete to substantiate the control efficiency stated for the measure. Next, although these filters have the ability to filter particulate matter from road dust, the filtration systems have no ability to filter out any toxic gases from vehicle exhaust. For the filtration of particulate matter from road dust, the limitations of the proposed mitigation should be considered for this project (enhanced filtration) on housing residents. For example, in a study that SCAQMD conducted to investigate filters⁵ 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. 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.

² <http://www.aqmd.gov/docs/default-source/ceqa/handbook/mobile-source-toxics-analysis.doc>

³ 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>

⁴ See Chapter 9 of the 2012 AQMP for further information

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

⁵ This study evaluated filters rated MERV 13+ while the proposed mitigation calls for less effective MERV 6 or better filters.

Accessed at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf?sfvrsn=0> .

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Compliance With SCAQMD Rule 1166 During Soil Disturbance Activities

Based on the previous uses at the project site including the existence of gasoline storage tanks, the Final CEQA document should describe how the Lead Agency will comply with SCAQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil due to the potential of encountering VOCs during soil disturbance activities described in the project description.

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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LAC160225-08
Control Number