



# South Coast Air Quality Management District

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## **Draft Environmental Impact Report (DEIR) for the Green Line Mixed Use Specific Plan**

The South Coast Air Quality Management District (SCAQMD) 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.

In the project description, the Lead Agency proposes to demolish the existing structures on the 2.53-acre site in an area zoned for Heavy Industrial (M-2) and construct 305 multi-family mixed use development. The SCAQMD staff is concerned that this proposed residential use is located with one quarter mile of over 20 SCAQMD permitted facilities, including a gasoline station, a rail road operated by Union Pacific, and a shipping/freight facility with heavy-duty diesel truck activity. Therefore, both the stationary and mobile source emissions have the potential to expose future residents to toxic air contaminants and odors.

If the proposed project will expose future sensitive receptors to potential adverse health impacts from carcinogenic emissions generated by the SCAQMD permitted stationary sources and from the nearby rail and truck operations, SCAQMD staff recommends that a health risk assessment (HRA) be conducted. The HRA should include the SCAQMD permitted sources (i.e., the gasoline storage and dispensing equipment, the auto-body shop spray booths) emitting toxic air contaminants (TACs) within one quarter mile of the project site. The HRA should also include all warehouse sites within 1,000 feet that include truck activity that exceeds 100 trucks per day, or where more than 40 trucks with operating transport refrigeration units (TRUs) per day, or where TRU units exceed 300 hours per week. Risk assessment guidance resources for stationary permit and mobile sources are located at the following links on the SCAQMD website. Stationary permit sources guidance: <http://www.aqmd.gov/home/permits/risk-assessment>. Mobile source guidance that include diesel trucks, locomotive engines, etc., can be located at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>. To determine SCAQMD permitted facility equipment near the proposed project site, refer to the SCAQMD website link for the Facility Information Detail (FIND) data base under Business Tools located at: <http://www.aqmd.gov/home/tools/business>.

The Lead Agency quantified the operational emissions and failed to quantify the project's construction emissions. Additionally, the Lead Agency did not provide the CalEEMod reports for SCAQMD staff to review. SCAQMD staff recommends calculating the construction impacts and comparing the results to regional and localized significance thresholds. Furthermore, SCAQMD staff recommends providing the CalEEMod reports to substantiate the proposed project's air quality impacts.

The proposed project is also adjacent to sensitive land uses<sup>1</sup> (e.g., residential dwellings exist to the southeast); however, the Draft MND did not evaluate potential localized air quality impacts that could result from construction of the proposed project. Therefore, the SCAQMD staff recommends that the Lead Agency revise the air quality analysis to include an assessment of potential localized air quality impacts during demolition and construction of the proposed project. These potential air quality impacts should be assessed using SCAQMD's Localized Significance Methodology and compared to the localized significance thresholds specific to the project area<sup>2</sup>. Furthermore, the Lead Agency should ensure that all future projects include a localized air quality analysis if warranted. In the event that the Lead Agency determines the proposed project will result in significant localized construction air quality impacts, the SCAQMD staff recommends that the Lead Agency require mitigation to minimize these impacts to a less than significant level. Additional construction-related air quality mitigation measures are available at: [http://www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html)

Pursuant to Public Resources Code Section 21092.5, SCAQMD staff requests that the Lead Agency provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. Further, staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Jack Cheng, Air Quality Specialist, at (909) 396-2448, if you have any questions regarding the enclosed comments.

Sincerely,

*Jillian Wong*

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<sup>1</sup> 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>

<sup>2</sup> The Localized Significance Threshold (LST) methodology and Mass Rate LST Look Up Table is available at: <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>