



South Coast Air Quality Management District

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Draft Environmental Impact Report (Draft EIR) for the Proposed Avion Burbank Project (SCH: 2017061019)

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.

SCAQMD Staff's Summary of Project Description

The lead agency proposes to construct a mixed-use development that will consist of 15,475 square feet of retail space, 142,250 square feet of office use, a 101,230-square-foot hotel with 166 rooms, and 1,014,887 square feet of industrial use on 61 acres (proposed project). The project is located at 3001 North Hollywood Way on the southwest corner of San Fernando Road and North Hollywood Way in the City of Burbank.

SCAQMD Staff's Summary of Air Quality Analysis

The lead agency determined that the proposed project would have exceeded SCAQMD's CEQA Significance Threshold for operational NO_x emissions and have significant and unavoidable impacts to regional air quality during operation. Please see SCAQMD staff's detailed comments regarding the air quality analysis and suggestions for further mitigation below.

SCAQMD Staff's Comments

Air Quality Analysis

The proposed project will include 1,014,887 square feet of industrial use. Although building tenant(s) are currently unknown at the time of circulation of the draft EIR, the lead agency has committed to Mitigation Measure AIR-3, which requires that all industrial and commercial uses that occur at the proposed project shall provide electrical connections for trucks with transport refrigeration units (TRUs) and that all electric-capable TRUs utilize the connection when in use.¹ Since TRUs are commonly in-use at cold storage warehouses, and building tenants are unknown, it is reasonably foreseeable that the industrial use at the proposed project could incorporate cold storage. However, the air quality analysis does not quantify emissions for cold-storage warehouse uses. If TRUs will be used during operation of the proposed project, the SCAQMD staff recommends that the lead agency revise the air quality analysis and Health Risk Assessment (HRA) to calculate and disclose operational emissions from TRUs in the final CEQA document.

¹ Draft EIR. Executive Summary, Page 1-9.

Additional Operational Mitigation Measures

As described in the SCAQMD's 2016 Air Quality Management Plan, achieving NO_x emissions reduction in a timely manner is critical in order to meet attainment of the National Ambient Air Quality Standard for ozone levels before the 2023 and 2031 deadlines.² The proposed project contributes to significant regional NO_x emissions. Therefore, SCAQMD staff recommends that the lead agency review and incorporate the following mobile source-related mitigation measures to further reduce operational NO_x emissions.

- Require the use of zero and near-zero emissions technologies that are commercially available now and in the future into daily operations to the fullest extent feasible. Such technologies can include non-diesel landscaping equipment like electric lawn mowers and leaf blowers and non-diesel warehouse equipment such as electric forklifts and hybrid electric medium-duty trucks.
- Have truck routes clearly marked with trailblazer signs, so that trucks will not enter residential areas
- Trucks that can operate at least partially on electricity have the ability to substantially reduce the significant NO_x impacts from this project. Further, trucks that run at least partially on electricity are projected to become available during the life of the project as discussed in the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS).³ It is important to make this electrical infrastructure available when the project is built so that it is ready when this technology becomes commercially available. The cost of installing electrical charging equipment onsite is significantly cheaper if completed when the project is built compared to retrofitting an existing building. Therefore, SCAQMD staff recommends the lead agency require the proposed project and other plan areas that allow truck parking to be constructed with the appropriate infrastructure to facilitate sufficient electric charging for trucks to plug-in.
- Limit the daily number of trucks allowed at the proposed project to levels analyzed in the final CEQA document. If higher daily truck volumes are anticipated to visit the site, the lead agency should commit to re-evaluating the proposed project through CEQA prior to allowing this land use or higher activity level.

Compliance with SCAQMD Rules

Due to historical uses at the site, large earth moving activities that will occur during construction of the proposed project may release Toxic Air Contaminants. Therefore, SCAQMD Rule 1466 – Control of Particulate Matter from Soils with Toxic Air Contaminants may be applicable and a discussion of compliance should be incorporated into the final CEQA document.⁴

SCAQMD staff is available to work with the lead agency to address any air quality questions that may arise from this comment letter. Please contact Alina Mullins, Assistant Air Quality Specialist, at amullins@aqmd.gov or (909) 396-2402, should you have any questions.

² South Coast Air Quality Management district. March 3, 2017. *2016 Air Quality Management Plan*. Accessed at: <http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan>.

³ Southern California Association of Governments. 2016 RTP/SCS. Accessed at: <http://scagrtpsc.net/Pages/FINAL2016RTPSCS.aspx>.

⁴ South Coast Air Quality Management District, Rule 1466 – Control of Particulate Matter from Soils with Toxic Air Contaminants, Accessed at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf?sfvrsn=19>.

Sincerely,

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