



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Draft Supplemental Environmental Impact Report (Draft SEIR) for the Proposed Plaza Mexico Residences (Lynwood Transit Area Specific Plan) (SCH No.: 2015121020)

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 SEIR.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes the construction and operation of a 277,533 square feet (SF) multi-story building with 348 residential units and an additional 26,417 SF of retail and restaurant uses on a 3.6-acre portion (Proposed Project) of the 315-acre Lynwood Transit Area Specific Plan (LTASP)¹. The Proposed Project is located at 3000 East Imperial Highway on the northwest corner of State Street and Beechwood Avenue. The Proposed Project is adjacent to Interstate 105 (I-105) Freeway. Specifically, the Proposed Project is less than 500 feet north of the I-105 Freeway. The construction phase of the Proposed Project is expected to occur over a 13 month period beginning in 2018 and the operational phase of the project is expected to begin in 2020².

SCAQMD Staff's Summary of Air Quality Analysis

In the air quality section of the Draft SEIR, the Lead Agency quantified the Proposed Project's construction and operational emissions and compared the impacts to SCAQMD's regional and localized air quality CEQA significance thresholds. Based on the analysis, the Lead Agency determined that the Proposed Project would result in significant localized air quality impacts during construction from PM10 and PM2.5 emissions. Implementation of construction-related air quality mitigation measures, will reduce the Proposed Project's localized construction emission impacts to less-than-significant.³

Health Risk Assessment from Mobile Sources and Other Sources of Air Pollution

As mentioned above, the Proposed Project is within 500 feet of I-105 Freeway. Therefore, SCAQMD staff recommends that the Lead Agency incorporate mitigation measures AQ 4(a) through AQ 4(e) from the LTASP in the Proposed Project.⁴ These mitigation measures are specific to conducting Health Risk Assessments, installing HV systems that meet MERV 13 standards, and other considerations intended to minimize the Proposed Project's health risk impacts. Additional guidance to address these concerns are available at: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>.

Notwithstanding the court rulings, SCAQMD staff recognizes that the Lead Agencies that approve CEQA documents retain the authority to include any additional information they deem relevant to assessing and

¹ Draft SEIR. Section 1.4.2, *Executive Summary*, Page 1.7

² Draft SEIR. Appendix A, Page A-1

³ Draft SEIR. Section 5: *Air Quality*, Table 5.1-13, Page 5.1-33

⁴ Draft SEIR. Section 1: *Executive Summary*, Table 1-2, Page 1-11

mitigating the environmental impacts of a project. Because of SCAQMD's concern about the potential public health impacts of siting sensitive land uses, such as residential uses within a close proximity of freeways, SCAQMD staff recommends that the Lead Agency review and consider the following comments when making local planning and land use decisions.

Sensitive receptors are people that have an increased sensitivity to air pollution or environmental contaminants. Sensitive receptors include schools, daycare centers, nursing homes, elderly care facilities, hospitals, and residential dwelling units. Based on a review of the Project Description, Project Location, Figure 3-2, and aerial photographs, SCAQMD staff found that the Proposed Project is located less than 500 feet north of I-105 Freeway, and SCAQMD-permitted industrial facilities⁵ are located in the immediate vicinity of the Proposed Project. Residents living at the Proposed Project would be exposed to diesel particulate matter (DPM) emissions from vehicles and diesel-fueled heavy-duty trucks traveling on I-105 Freeway, and may also be exposed to toxic emissions from the nearby industrial operations. DPM is a toxic air contaminant and a carcinogen. To facilitate the purpose and goal of CEQA on public disclosure, SCAQMD staff recommends that the Lead Agency consider the health impacts on people at the Proposed Project by performing a HRA⁶ analysis to disclose the potential health risks in the Final SEIR.

Guidance on Siting Sensitive Receptors Near a High-Volume Freeway and Other Sources of Air Pollution
Guidance on siting incompatible land uses (such as placing homes near freeways) can be found in the California Air Resources Board's Air Quality and Land Use Handbook: A Community Health Perspective, which can be found at: <http://www.arb.ca.gov/ch/handbook.pdf>. CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process.

Correction to Existing Mitigation Measure AQ-3

SCAQMD staff found an inconsistency between mitigation measure AQ-3 and the analysis in section 5.1.9. Mitigation measure AQ-3 requires the use of Level 2 Diesel Particulate Filters (DPF), while the discussion in section 5.1.9 states, "Mitigation Measure AQ-2 would require use of Level 3 Diesel Particulate Filters."⁷

SCAQMD staff recommends that the Lead Agency incorporate the following correction to AQ-3 in the Final SEIR to fix the inconsistency and further reduce NOx and PM emissions. Additional information on potential mitigation measures as guidance to the Lead Agency are available on the SCAQMD CEQA Air Quality Handbook website at <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.

MM AQ-3: The construction contractor shall install Level 2 Diesel Particulate Filters (DPF) on off-road construction equipment used during ground disturbing activities. Prior to construction, the project engineer shall ensure that all demolition and grading plans clearly show the requirement for use of Level 2 DPF or higher emissions standards for equipment used during ground disturbing activities. During construction, the construction contractor shall maintain a list of all operating equipment in use on the construction site

⁵ South Coast Air Quality Management District. Information on SCAQMD-permitted industrial facilities may be obtained by searching in the Facility Information Detail (FIND). Accessed at: <http://www3.aqmd.gov/webappl/fim/prog/search.aspx>

⁶ South Coast Air Quality Management District. Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/airquality-analysis-handbook/mobile-source-toxics-analysis>.

⁷ Draft SEIR. Chapter 5, *Air Quality*, Page 5.1-32

for verification by the City of Lynwood. The construction equipment list shall state the makes, models, and numbers of construction equipment onsite. Equipment shall be properly serviced and maintained in accordance with the manufacturer's recommendations. Construction contractors shall also ensure that all nonessential idling of construction equipment is restricted to five minutes or less in compliance with California Air Resources Board's Rule 2449.

SCAQMD Permits

If any subsequent development or activities implemented under the Proposed Project require a permit from SCAQMD, SCAQMD is a Responsible Agency. For more information on permits, please visit SCAQMD webpage at: <http://www.aqmd.gov/home/permits>. Questions on permits can be directed to SCAQMD's Engineering and Permitting staff at (909) 396-3385.

Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), SCAQMD staff requests that the Lead Agency provide SCAQMD staff with written responses to all comments contained herein prior to the certification of the Final SEIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful or useful to decision makers and to the public who are interested in the Proposed Project. Further, when the Lead Agency makes the finding that the recommended mitigation measures are not feasible, the Lead Agency should describe the specific reasons for rejecting them in the Final SEIR (CEQA Guidelines Section 15091).

SCAQMD staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Robert Dalbeck, Assistant Air Quality Specialist, at rdalbeck@aqmd.gov, if you have any questions regarding these comments.

Sincerely,

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Planning, Rule Development & Area Sources

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