



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:

James.Howe@ladwp.com

James R. Howe, Environmental Specialist
City of Los Angeles Department of Water and Power
111 N. Hope St., Room 1044
Los Angeles, CA 90012

May 24, 2024

Mitigated Negative Declaration (MND) for the Proposed Headworks Site Development Project (Proposed Project)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to review the above-mentioned document. The City of Los Angeles Department of Water and Power (LADWP) is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff (Staff) has provided a brief summary of the project information and prepared the following comments.

South Coast AQMD Staff's Summary of Project Information in the MND

Based on information provided in the MND, the Proposed Project consists of construction and operation of three facilities within LADWP's existing Headworks Spreading Grounds (HWSG) site.¹ The Proposed Project site is approximately 43 acres and adjacent to the Los Angeles River and State Route 134.² The three facilities to be developed include 1) a Water Quality Laboratory (WQL) with 100,000 square feet (sq ft) of floor space; 2) a Direct Potable Reuse (DPR) Demonstration Facility to test various water purification technologies for treating recycled wastewater; and 3) a public park (Headworks Restoration Park) to provide recreational and educational opportunities regarding local ecosystems, the Los Angeles River, and water use.³ Currently on the eastern portion of the Proposed Project site are two roofed reservoirs (Headworks West Reservoir and Headworks East Reservoir) with a combined storage capacity of 110 million gallons (MG).⁴ A portion of the public park will be developed on top of the existing Headworks West Reservoir.⁵ The Proposed Project site is owned by the Los Angeles Department of Recreation and Parks (LADRAP) but LADWP has a site easement.⁶ The park would be managed by LADRAP but LADWP would maintain access to reservoirs and associated facilities.⁷ The WQL would be equipped with diesel-powered emergency generators.⁸ Construction of the Proposed Project is anticipated to commence in the third quarter of 2024, last seven years, and be completed by the fourth quarter of 2031.⁹ The Proposed Project site is located within the boundaries of Griffith Park at 6001 West Forest Lawn Drive, Los Angeles, California 90068.¹⁰

South Coast AQMD Staff's Comments on the MND

¹ Draft Initial Study/Mitigated Negative Declaration for the Headworks Site Development Project (IS/MND). Pages 2 through 6.

² IS/MND. Pages 1 through 2.

³ *Ibid.* Pages 8 through 9.

⁴ *Ibid.* Page 2.

⁵ *Ibid.* Page 6.

⁶ *Ibid.* Page 1.

⁷ *Ibid.* Page 13.

⁸ *Ibid.* Page 8.

⁹ *Ibid.* Page 11.

¹⁰ *Ibid.* Page 1.

South Coast AQMD Air Permits and Role as a Responsible Agency

As mentioned above, Staff reviewed the MND and noted that the WQL would be equipped with diesel-powered emergency generators.¹¹ The Lead Agency also states in the MND that South Coast AQMD permits and/or approvals for construction and operation may be required.¹² If implementation of the Proposed Project would require the use of new stationary sources, including but not limited to emergency generators, fire water pumps, boilers, etc., air permits from South Coast AQMD will be required and the role of South Coast AQMD would change from a Commenting Agency to a Responsible Agency under CEQA. In addition, if South Coast AQMD is identified as a Responsible Agency, per CEQA Guidelines Section 15086, the Lead Agency is required to consult with South Coast AQMD. Furthermore, CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of evaluating the applications for air permits. For these reasons, the Final MND should include a discussion about any new stationary equipment requiring South Coast AQMD air permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project.

The Final MND should also include calculations and analyses for construction and operation emissions for any new stationary sources, as this information will also be relied upon as the basis for the permit conditions and emission limits for the air permit(s). Based on the CalEEMod output files in Appendix A (see screenshot below) and additional technical data files provided to Staff upon request (e-mail communication with James Howe, May 14, 2024), it appears that emission calculations and associated analyses for the WQL diesel-powered emergency generators were not included in the MND. Please contact South Coast AQMD’s Engineering and Permitting staff at (909) 396-3385 for questions regarding what types of equipment would require applications for new air permits. For more general information on permits, please visit South Coast AQMD’s webpage at: <http://www.aqmd.gov/home/permits>.

LADWP Headworks Project - Operations Detailed Report, 1/30/2024

Research & Development	Household refrigerators and/or freezers	R-134a	1,430	0.45	0.60	0.00	1.00
Research & Development	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0
City Park	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0
City Park	Stand-alone retail refrigerators and freezers	R-134a	1,430	0.04	1.00	0.00	1.00

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
----------------	-----------	-------------	----------------	---------------	------------	-------------

5.15.2. Mitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
----------------	-----------	-------------	----------------	---------------	------------	-------------

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor
----------------	-----------	----------------	---------------	----------------	------------	-------------

5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)
----------------	-----------	--------	--------------------------	------------------------------	------------------------------

5.17. User Defined

Equipment Type	Fuel Type
----------------	-----------

Figure 1. Screenshot of Appendix A, Air Quality Impact Study, LADWP Headworks Project – Operations Detailed Report, page 39/47

¹¹ *Ibid.* Page 8.

¹² *Ibid.* Pages 14 through 15.

Conclusion

The Lead Agency is recommended to revise the CEQA analysis to address the aforementioned comments and provide the necessary evidence to sufficiently support the conclusions reached. If the requested information and analysis are not included in the final CEQA document, either the Final MND or other type of CEQA document, the Lead Agency should provide reasons for not doing so. Pursuant to California Public Resources Code Section 21092.5(b) and CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process and notify each public agency when any public hearings are scheduled. Please provide South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided. In addition, if the Lead Agency decides to adopt the Final MND, please provide South Coast AQMD with a notice of any scheduled public hearing(s).

Thank you for the opportunity to provide comments. South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Evelyn Aguilar, Air Quality Specialist, at eaguilar@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

Sam Wang

Program Supervisor, CEQA IGR

Planning, Rule Development & Implementation

SW:EA

LAC240501-01

Control Number