



South Coast Air Quality Management District

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Draft Mitigated Negative Declaration (MND) **for the Proposed 119-Room Eldercare Facility (ENV-2015-2229-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 MND.

Project Description

The Lead Agency proposes construction of a 119-Room Eldercare Facility accommodating 191 beds for seniors, 62 years and older, in a four-story, 82,700 square foot building on a vacant lot approximately 0.80-acres in size. Underground parking for approximately 65-vehicles will be provided for vehicles coming to the facility. Information used as assumptions in air quality analyses including the amount of excavation and applicable soil export, the number of soil hauling trips and disposal destinations, project phasing and the opening year should be included in the Final MND along with, at minimum, summary information that supports the lead Agency's determinations that project air quality impacts are less than significant. This information can be included in the narration, in tables or in an appendix.

Air Quality Analyses

The Lead Agency has determined that the project's air quality emissions would result in less than significant impacts during construction and operation activities but did not quantify short- or long-term air quality emissions. Without quantifying project air quality impacts, the Lead Agency has not demonstrated that the proposed project will not generate significant adverse construction or operational air quality impacts that may trigger further analysis or require mitigation measures pursuant to the California Environmental Quality Act. Therefore, the SCAQMD recommends that the Lead Agency demonstrate that project impacts are less than significant in the Final MND by estimating short- and long-term air quality impacts using the current California Emission Estimator Model (CalEEMod)¹. CalEEMod is a statewide land use emissions model that can quantify potential project criteria pollutant and greenhouse (GHG)

¹ <http://www.aqmd.gov/home/regulations/ceqa/air-quality-modeling>

emissions. The Lead Agency can also estimate project emissions by following the calculation methodologies in Chapter 9 and the Appendix to Chapter 9 in the South Coast SCAQMD's CEQA Air Quality Handbook².

Based on an aerial map inspection and in the environmental settings section on page eight, the proposed project is located within one-quarter mile of sensitive receptors (residential properties) north, south and east of the project site. Therefore, the SCAQMD staff recommends that the Lead Agency evaluate localized air quality impacts to ensure that any nearby sensitive receptors are not adversely affected by the construction activities that are occurring in close proximity. SCAQMD guidance for performing a localized air quality analysis can also be found at the SCAQMD website³. Should the Lead Agency conclude after its analyses that construction or operational air quality impacts exceed the SCAQMD daily significance thresholds, staff has compiled mitigation measures,⁴ in addition to the measures listed in the Draft MND starting on page two, to be implemented if the air quality impacts are determined to be significant.

Health Risk Assessment

The proposed project site is located less than five hundred feet of the I-5 Freeway and within approximately 585 feet of a gasoline fueling station. Project residents would living adjacent to the freeway, of which I-5 has a peak daily traffic volume of 153,000 vehicles, which includes 11,781 diesel trucks.⁵ Because of the close proximity to the existing freeway, residents would be exposed to diesel particulate matter, which is a toxic air contaminant. In addition, gasoline vapors from the refueling station are also carcinogenic and would contribute cancer risk to project residents and workers. The SCAQMD staff therefore recommends that the Lead Agency prepare a mobile source health risk assessment in order to disclose the potential health risks to the residents and staff from vehicles that use the freeway including diesel-fueled vehicles that emit diesel particulate matter and the refueling emissions, which the California Air Resources Board (CARB) has determined to be carcinogenic. The SCAQMD's recommended methodology for analyzing cancer risks from mobile source diesel emissions can be found on the SCAQMD website.⁶ The SCAQMD staff also recommends evaluating the risk from the refueling operations using the approved methodologies for stationary sources.⁷

CARB Advisory Guidance Recommendation to Avoid Siting Housing and Medical Facilities 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 sensitive receptors such as housing and medical facilities within 500 feet of a freeway in their Land Use Handbook.⁸ Since the time of that study,

² <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>

³ <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>

⁴ <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>

⁵ <http://traffic-counts.dot.ca.gov/> Traffic Volumes (I-5 at San Fernando Mission Blvd) and Truck Traffic (I-5 at Jct. Rte. 118).

⁶ <http://www.aqmd.gov/docs/default-source/ceqa/handbook/mobile-source-toxics-analysis.doc>

⁷ <http://www.aqmd.gov/home/permits/risk-assessment>

⁸California Air Resources Board. April 2005. "Air Quality and Land Use Handbook: A Community Health Perspective."

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.⁹

While the health science behind recommendations against placing sensitive receptors close to freeways is clear, SCAQMD staff recognizes the many factors Lead Agencies must consider when siting uses such as the new Eldercare Assisted Living and Memory Care Facility. 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

The Lead Agency should consider the limitations of enhanced filtration if later proposed as mitigation for this project for the project residents. For example, in a study that SCAQMD conducted to investigate filters 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. These filters also have no ability to filter out any toxic gasses from vehicle exhaust. 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.

Compliance With SCAQMD Rule 1166 During Soil Disturbance Activities

Should the Lead Agency encounter VOCs during potential soil disturbance activities including the excavation of the parking garage, the Final MND 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.

Accessed at: <http://www.arb.ca.gov/ch/landuse.htm>

⁹ See Chapter 9 of the 2012 AQMP for further information

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

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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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