



South Coast Air Quality Management District

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Community Development Department
City of Gardena
1700 W. 162nd Street
Gardena, CA 90247

Draft Mitigated Negative Declaration (DMND) for the Proposed Tentative Tract Map. No. 74350 Located at 16958 S. Western Avenue Project

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 Mitigated Negative Declaration.

In the project description, the Lead Agency proposes to demolish the existing 198-parking space area used for recreational vehicle storage on the 2.31-acre site in an area zoned for General Commercial (C-3) and construct 46-single family homes with 23 guest parking spaces. The SCAQMD staff is concerned that this proposed residential use is located with one quarter mile of at least three SCAQMD permitted facilities 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 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> .

In addition, the Final MND should cite compliance with SCAQMD Rule 1166 – Volatile Organic Compound Emissions From Decontamination of Soil if excavation equipment will disturb soil that contains hydrocarbon. Finally, SCAQMD Rule 402 – Nuisance should be discussed concerning potential odors that could come from the existing auto body shops located nearby.

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 air quality 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,



Jillian Wong, Ph.D.
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Planning, Rule Development & Area Sources

JW:GM

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