



South Coast Air Quality Management District

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Department of City Planning
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**Draft Mitigated Negative Declaration (MND) for the Proposed Industrial Street
Lofts Located at 1525 Industrial Street in the Central Los Angeles Area
(ENV-2013-2994)**

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.

In the project description, the Lead Agency proposes to demolish an existing industrial building, loading docks and freight truck storage area in order to begin construction of a 336,304 square foot mixed-use project located on an approximately 2.59-acre site. The new mixed-use project consists of 344 live/work units (299,302 square feet of floor area); 7,458 square feet of leasing/amenity area; 24,044 square feet of creative office uses; and 5,500 square feet of restaurant space. Parking will include one subterranean level and will require approximately of 51,000 cubic yards of soil export.

Health Risk Assessment

The SCAQMD staff is concerned that the proposed residents in the live/work units will be located close to industrial land uses including several SCAQMD permitted facilities within one quarter mile. In addition, the proposed project site is located near several facilities with diesel emissions including adjacent industrial and commercial buildings north, south and east of the proposed project site that have loading docks for diesel trucks that could also include diesel refrigeration units that could face the proposed residences. Further, project residences would be located less than one mile from a rail yard east of the project site. Diesel particulate matter emitted from diesel powered engines (such as from trucks and trains) has been classified by the state as a toxic air contaminant and a carcinogen.

Since future residences at the proposed project site would be exposed to toxic emissions from these nearby industries and train activity, the SCAQMD staff recommends that the Lead Agency estimate and disclose the potential health risks to these future residents from these sources. The Health Risk Assessment should evaluate all permitted and unpermitted sources of toxic emissions within a one quarter mile radius of the site to determine if health risks are below SCAQMD thresholds. Guidance for conducting a Mobile Source Toxics Analysis can be found on the SCAQMD website.¹

CARB Advisory Guidance Regarding the Siting of Sensitive Receptors

The California Air Resources Board (CARB) provides advisory guidance regarding the siting of sensitive receptors near sources of air pollution based on numerous health studies that have demonstrated the potential adverse health effects of living near sources of air contaminants.² In the Land Use Guidelines, CARB advises avoiding the siting of new sensitive land uses within 1,000 feet of a facility that accommodates more than 100 trucks per day or where more than 40 trucks operate daily with transportation refrigeration units (TRUs). The site plan should also avoid locating residences and other sensitive receptors near truck entry and exit points. The Land Use Guidelines also recommends distances as a buffer between residents and other sources such as gasoline stations, dry cleaning operations and rail yards.

Estimating On-Site Localized Significance Threshold Impacts

In addition, the air quality analysis estimated project regional and localized emission impacts. Under localized operational emissions on page IV-13, the Lead Agency included a CO Hotspots analysis, which estimates emission impacts at nearby intersections but did not estimate operational emissions generated on-site, e.g., resident and employee vehicle emissions, vehicle emissions that occur from customers and delivery trucks operating at the site, emissions from energy used to heat, cool and light the different uses, etc. Guidance for performing the Localized Significance Thresholds (LST) analysis for operations is located on the SCAQMD website.³

SCAQMD Rules 1166 and 1403

Finally, the project description includes soil disturbance activities including the excavation of the subterranean garage, and based on the proposed demolition of an existing building, potential contact with asbestos could occur. Should volatile organic compounds be found during soil disturbance activities, the Final MND should include how the Lead Agency will comply with SCAQMD Rule 1166 – Volatile Organic

¹ Air Quality Analysis Handbook: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook> . Mobile Source Toxics Analysis: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis> .

² CARB, Air Quality and Land Use Handbook: A Community Health Perspective (April 2005), Table 1-1 on Page 4. <http://www.aqmd.gov/docs/default-source/ceqa/handbook/california-air-resources-board-air-quality-and-land-use-handbook-a-community-health-perspective.pdf?sfvrsn=0> .

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

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Compound Emissions from Decontaminated Soil, and if asbestos is encountered during demolition, SCAQMD Rule 1403 – Asbestos Emissions From Demolition/Renovation Activities.⁴

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,

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⁴ Rule 1166: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf?sfvrsn=4> ; and Rule 1403 <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1403.pdf?sfvrsn=4> .