



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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Mitigated Negative Declaration (MND) for the Proposed 15827 Roxford Street Project (ENV-2021-8928) (Proposed Project) (SCH: 2022080340)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The City of Los Angeles is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. The following comments include recommended revisions to the CEQA regional air quality impacts analysis for cleanup activities during construction, CEQA localized air quality impacts analysis for construction and operation, mobile source health risk assessment (HRA), and information about South Coast AQMD rules and permits that the Lead Agency should incorporate in the Final MND.

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

Based on the MND, the Lead Agency proposes demolishing an existing 182,230 square feet warehouse and constructing two new warehouses with a total of approximately 595,147 square feet, including 15,742 square feet of ancillary office space, on approximately 28 acres¹. The Proposed Project is located at 15827 Roxford Street in Sylmar². The Proposed Project site is north of Roxford Street, west of Telfair Avenue, and east of the I-5 freeway³. The two warehouses with 95 loading docks⁴ will involve 278 truck trips per day⁵. Additionally, a small extension of the Proposed Project would extend along an existing driveway to Roxford Street, used as a small surface parking lot for standard vehicles, located 140 feet from residential uses⁶. Based on a review of aerial photographs, South Coast AQMD staff found that the nearest sensitive receptor (e.g., residence) is approximately 956 feet southeast of the Proposed Project, located at the intersection between Roxford Street and Telfair Avenue. Construction of the Proposed Project is anticipated to last approximately 22 months. Operation is expected to start in 2024 as a Project's estimated buildout year.

¹ MND. Page 13, 15.

² *Ibid.* Page 7.

³ *Ibid.* Page 8.

⁴ *Ibid.*

⁵ Appendix K. Page 33.

⁶ MND. Page 24.

South Coast AQMD Staff's Comments*CEQA Regional Air Quality Impacts Analysis for Cleanup Activities during Construction*

Based on the Hazards and Hazardous Materials Section in the MND, there is a potential for contaminated soil and/or water that might involve off-site transportation and disposal during site grading activities⁷. Potential hazards on-site were identified: VOCs in soil vapor were detected on-site that exceeded pending supplemental State screening criteria⁸. Two VOCs were also reported in groundwater at concentrations above the screening criteria for drinking water⁹. In addition, an existing warehouse built in 1961 may contain asbestos-containing materials (ACMs) and lead-based paint (LBP)¹⁰ that will require handling, removal, and disposal during demolition activities. It is reasonably foreseeable that cleanup activities for remediating, controlling contaminated soil and/or groundwater, and demolition may occur prior to or concurrently with constructing two warehouse buildings. The Lead Agency included the Soil Removal Action Work Plan and Site Assessment to address hazard remediation in Appendix G and H. However, the Lead Agency did not analyze air quality impacts from cleanup activities during construction in the MND.

Cleanup activities will likely involve using heavy-duty, diesel-fueled trucks for soil export, resulting in emissions from truck hauling activities and vehicle trips by workers that will be required to conduct cleanup activities. Additionally, cleanup activities will likely require the use of additional equipment that may differ from typical equipment for grading and site preparation for construction. If cleanup activities are reasonably foreseeable at the time the MND was prepared, the Lead Agency should use good faith and best efforts to provide information on the scope, types, and duration of cleanup activities, quantify emissions from cleanup activities and include those emissions in the Proposed Project's construction emissions profile to be compared to South Coast AQMD's air quality CEQA significance thresholds for construction to determine the level of significance in the Final MND. Alternatively, if emissions from cleanup activities are not included in the Final MND, the Lead Agency should include a new air quality mitigation measure in the Air Quality Section of the Final MND to commit to evaluating the potential environmental impacts from cleanup activities through CEQA prior to commencing any cleanup activities. If a new air quality mitigation measure is not included in the Final MND, the Lead Agency should provide reasons supported by substantial evidence in the record to explain why a new air quality mitigation measure is not included.

Based on the emission calculations from the California Emissions Estimator Model (CalEEMod) output files, the Lead Agency used a one-way truck trip length of 5 miles to quantify the Proposed Project's construction emissions from hauling construction materials and importing or exporting soil (demolition and grading). Based on a review of aerial photographs, South Coast AQMD staff found the Sunshine Canyon Landfill as the nearest municipal waste landfill, less than 5 miles from the Project site within Los Angeles County, that could serve the Proposed Project. However, the Lead Agency did not identify a specific landfill for the Proposed Project in the MND. If cleanup activities would include removing and disposal of contaminated soil, ACMs, LBPs, or any

⁷ *Ibid.* Page 46.

⁸ *Ibid.* Page 47.

⁹ *Ibid.*

¹⁰ *Ibid.*

hazardous materials, depending on the type of contamination, contaminated materials may not be accepted at Sunshine Canyon Landfill. It may need to be disposed of at a permitted hazardous disposal facility outside Los Angeles County with a one-way truck trip length that is likely longer than 20 miles. Therefore, South Coast AQMD staff recommends that the Lead Agency identify the permitted hazardous disposal facility that the Proposed Project could use to dispose of contaminated soil if the cleanup activities involve transport and off-site disposal of contaminated soil and disclose the information in the Final MND. When quantifying emissions from transportation and off-site disposal, the Proposed Project's construction emissions from haul truck trips for transporting and disposing contaminated soil based on the appropriate one-way truck trip length should be recalculated. If the default one-way truck trip length of 20 miles is not recalculated for quantifying emissions from haul truck trips for transporting contaminated soil, the Lead Agency should provide reasons for not re-calculating it supported by substantial evidence in the record.

CEQA Localized Air Quality Impacts Analysis for Construction and Operation

In Appendix A, the Lead Agency analyzes the localized air quality impacts of the Proposed Project during construction and operation and compares them to the South Coast AQMD Localized Significance Thresholds (LST)¹¹. However, the Lead Agency uses different receptor distances when determining the South Coast AQMD LST. For construction, the Lead Agency determines that LST used for NO_x and CO is based on a 25-meter receptor distance, while for PM₁₀ and PM_{2.5} is approximately 44 meters¹². For operation, the LST used for NO_x and CO is also based on a 25-meter receptor distance, while approximately 244-meter receptor distance is used for PM₁₀ and PM_{2.5}¹³. Based on the South Coast AQMD Final Localized Significance Thresholds Methodology, the distance is from the Proposed Project's boundary to the nearest off-site receptor¹⁴. The receptor distances should be consistent with all criteria pollutants as emissions are generated from the same sources involved in the Project's construction and operation. South Coast AQMD staff recommends that the Lead Agency revise the LST air quality analysis for construction and operation using consistent receptor distances and choose the most conservative distance when re-analyzing this section and include them in the Final MND. If the revision is not included in the Final MND, the Lead Agency should provide reasons for not having it supported by substantial evidence in the record.

Mobile Source Health Risk Assessment during Operation

Based on the MND and technical appendices review, South Coast AQMD staff found that the Lead Agency did not perform a mobile source health risk assessment (HRA) during operation. Because the operation of the warehousing portion of the Proposed Project will attract heavy-duty, diesel-fueled vehicular trips (e.g., 278 truck trips per day) that emit diesel particulate matter, which is an air toxic and carcinogen. Additionally, in the California Air Resources Board (CARB) Air Quality and Land Use Handbook: A Community Health Perspective, it is recommended that sitting new

¹¹ Appendix A. Page 17-19

¹² *Ibid.* Page 11.

¹³ *Ibid.* Page 12

¹⁴ South Coast AQMD Localized Significance Thresholds can be found at:

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

sensitive land uses (e.g., residences) should not be sitting within 1,000 ft of a distribution center that accommodates more than 100 trucks per day, more than 40 TRU trucks per day¹⁵. The CARB Air Quality and Land Use Handbook provide advisory recommendations on sitting new sensitive land use near source, which are the two warehouses of the Proposed Project. However, multiple residences are located within 1,000 ft of the Proposed Project site. The nearest sensitive receptor is located within 956 ft southeast of the Proposed Project (refer to the South Coast AQMD Staff's summary above). Furthermore, the Proposed Project would extend along an existing driveway to Roxford Street, which is located 140 ft from residential uses¹⁶, and trucks are also accessed to the Project site via this driveway. Therefore, South Coast AQMD staff recommends that the Lead Agency perform a mobile source HRA with truck routes and compare the Proposed Project's cancer risk to South Coast AQMD CEQA significance threshold of 10 in one million for cancer risk to determine the level of significance for the Proposed Project's health risk impact in the Final MND¹⁷. If a mobile source HRA is not included in the Final MND, the Lead Agency should provide reasons for not having it supported by substantial evidence in the record.

Responsible Agency and South Coast AQMD Permits

In the event that cleanup activities at the Proposed Project or implementation of the Proposed Project require the use of stationary equipment, permits from South Coast AQMD are required unless a written permit is not required¹⁸. The Lead Agency should use good faith effort to include a discussion of equipment that will require South Coast AQMD permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project in the Final MND. If any activities involve using equipment that either emits or controls air pollution, the Lead Agency should consult with South Coast AQMD staff to determine whether or not permits or plans are required and approved by South Coast AQMD prior to the operation and to identify if any other South Coast AQMD Rules, such as Rule 431.2 – Sulfur Content of Liquid Fuels¹⁹ and Rule 1110.2 – Emissions from Gaseous and Liquid-Fueled Engines²⁰, will be applicable and discussed in the Final MND. Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 or visit South Coast AQMD's web page for more general information on permits: <http://www.aqmd.gov/home/permits>.

Conclusion

According to 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. Please provide South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When the Lead Agency's position is at variance with recommendations raised in the comments, the issues raised in the comments should be addressed in detail, giving reasons why specific comments and suggestions are not accepted.

¹⁵ CARB) Air Quality and Lan Use Handbook: A Community Health Perspective can be found at:

<https://www.arb.ca.gov/ch/handbook.pdf>.

¹⁶ MND. Page 24.

¹⁷ South Coast AQMD's guidance for performing a mobile source health risk assessment can be found at:

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

¹⁸ South Coast AQMD. Rule 219. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/Rule-219.pdf>.

¹⁹ South Coast AQMD. Rule 431.2 – Sulfur Content of Liquid Fuels. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-431-2.pdf>.

²⁰ South Coast AQMD. Rule 1110.2 – Emissions from Gaseous- and Liquid-Fueled Engines. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1110-2.pdf>.

There should be good faith and reasoned analysis in response. Conclusory statements unsupported by factual information do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision-makers and the public who are interested in the Proposed Project.

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 Danica Nguyen, Air Quality Specialist, at dnguyen1@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

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Program Supervisor, CEQA IGR

Planning, Rule Development, and Implementation

SW:DN

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