



South Coast Air Quality Management District

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Review of the Draft Environmental Impact Report (DEIR) for the Proposed La Plaza Cultural Village Project (SCH No. 2014031061; Project No. R2014-00619); EA No. RENV201400051

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 Environmental Impact Report.

The project site occupies approximately 3.7 acres but is separated by North Broadway resulting in two separate lots identified in the project description as Block A and Block B. The lead agency proposes to demolish the existing one-story commercial building on Block A and an existing surface parking lot on each of the two lots followed by construction of a 425,000 square foot mixed-use project developed on the two lots. The proposed project would include: 345 residential units; 55,000 square feet of retail uses; an open space path to connect with surrounding streets, transit, and nearby businesses; and subterranean parking on both Blocks A (3-subterranean levels) and B (4-subterranean levels) totaling up to 786 parking spaces. Construction is expected to be completed in approximately 30 months beginning in the fall of 2015 and be completed in early 2018. Approximately 15,960 total truck trips are expected to haul away debris and excavated soil from the site to disposal areas.

Health Risk Analysis

In the project description, the proposed project would include sensitive receptors, people living in the proposed 345 residential units. The project site would be bounded on the south by the US 101 Freeway that has a daily traffic volume of 207,000 vehicles including vehicles that are diesel fueled. In addition, the Draft EIR notes on page 3-1 that the project site is "located approximately 1,000 feet east of" Union Station, a major transportation hub in the Western United States where many diesel-powered train locomotive engines and diesel buses operate. During occupancy, both of these existing sources would expose sensitive receptors to pollutants including Toxic Air Contaminants (TAC) due to existing ambient air pollution in the vicinity.

Under “Toxic Air Contaminants” in the Air Quality Section of the Draft EIR, the lead agency has determined that project residents would be exposed to substantial pollutant concentrations including the TACs from the surrounding transportation corridor areas during project operation resulting in a significant impact. This determination was made, however, without identifying or disclosing the degree of health risk effects to the future sensitive receptors and comparing those estimates to recognized significance thresholds. Instead, the lead agency proposes mitigation to reduce on-site exposure from the off-site TACs. Without quantification though, the potential cancer risk to future residents during operation is unclear as well as whether the proposed Mitigation Measure presented on page 4.2-28 to mitigate emissions from the freeway and Union Station are sufficient to reduce risks to levels below SCAQMD significance thresholds. The lead agency should therefore conduct a health risk assessment (HRA) to determine both the baseline risk and the mitigated risk prior to determining if the proposed mitigation will sufficiently alleviate the identified significant impacts. In addition to the vehicles operating on the US 101 Freeway that are within 500 feet of the proposed project site, guidance from the California Air Resources Board (CARB) Air Quality and Land Use Handbook: A Community Perspective (CARB Handbook) also advises not siting new sensitive receptors within 1,000 feet of a major rail yard. Therefore, any sources that emit TACs from Union Station that are within 1,000 feet of the proposed project site should also be included in the HRA analysis.

Mitigation During Operations

In the Draft EIR, the Lead Agency discussed, under Toxic Air Contaminants starting on page 4.2-26, potential exposure to project residents from vehicle generated TACs from the US 101 Freeway, south of the project site. As mentioned in this letter’s previous paragraph, other potential off-site TAC emission sources located at Union Station could fall under the advisory guidance of the CARB Handbook as well. Numerous health studies have demonstrated the potential adverse health effects of living near highly travelled roadways and major rail yards. As a result of these studies, in 2005 the California Air Resources Board recommended avoiding siting housing within 500 feet of a freeway or within 1,000 feet of a major rail yard in their Land Use Handbook.¹ Additional research has continued to support that the near roadway environment 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.²

While the health science behind recommendations against placing new residences close to freeways or major rail yards is clear, the SCAQMD staff recognizes the many factors lead agencies must consider when siting new housing. Further, many mitigation measures have been included in the Draft EIR and proposed for other projects to reduce exposure, including building filtration systems, placing the residential units furthest from the freeway, making any windows facing the freeway inoperable, building sound walls, planting vegetation barriers, etc. However, because of the potential health risks involved, it is critical that any proposed mitigation must be

¹ California Air Resources Board. April 2005. “Air Quality and Land Use Handbook: A Community Health Perspective.” Accessed at: <http://www.arb.ca.gov/ch/landuse.htm>

² See Chapter 9 of the 2012 AQMP for further information at: [http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2012-air-quality-management-plan/final-2012-aqmp-\(february-2013\)/chapter-9-final-2012.pdf](http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2012-air-quality-management-plan/final-2012-aqmp-(february-2013)/chapter-9-final-2012.pdf).


carefully evaluated prior to determining if those health risks would be brought below recognized significance thresholds.

Limits to Enhanced Filtration Units

Lastly, the lead agency should consider the limitations of the proposed mitigation for this project (enhanced filtration) on housing residents. For example, in a study that SCAQMD conducted to investigate filters³ 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.

Pursuant to Public Resources Code Section 21092.5, SCAQMD staff requests that the Lead Agency provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. Further, 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) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,



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³ <http://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf?sfvrsn=0> . This study evaluated filters rated MERV 13+ while the proposed mitigation calls for less effective MERV 12 or better filters.