



# South Coast Air Quality Management District

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SENT VIA USPS AND E-MAIL:

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## **Draft Mitigated Negative Declaration (Draft MND) for the Proposed Sun Valley Industrial Project (ENV-2015-1805)**

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 CEQA document.

The Lead Agency proposes the redevelopment of an existing truck parking and solid waste container storage yard on a site approximately 15.8-gross acres in size. New construction is planned for two warehouse distribution buildings totaling approximately 361,038 square feet with 371 parking spaces and 22-trailer stalls. Building one will be approximately 96,970 square feet and Building two will be approximately 264,068 square feet in size. Construction phasing is not expected to overlap and is planned to start in early 2016 (January) and be completed around mid-2017 (June).

In the Draft MND posted on the Lead Agency's website, the Lead Agency included the results of the different analyses referencing studies conducted to estimate different project air quality and health affect impacts. The posted document, however, did not include the actual supporting documentation that would allow SCAQMD staff or other interested parties to review a complete document during the public comment period. The SCAQMD staff requested the supporting documentation,<sup>1</sup> which the Lead Agency attempted to fill but the limitations of the comment period do not allow for adequate review if the CEQA document and all cited supporting documentation are not available during the review period. For future documents, the CEQA document and all appendices or technical documents related to the air quality and greenhouse gas analyses with the electronic versions of all air quality modeling and health risk assessment files should be

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<sup>1</sup>The Complete Air Quality Analysis (FirstCarbon Solutions, 2015) including Appendix A – Air Quality Analysis (CalEEMod Output Sheets); Health Risk Assessment: San Joaquin Valley Air Pollution Control District Health Screening Tool documentation, 2011 (FirstCarbon Solutions, 2015); and Traffic Analysis (Kunzman Associates, 2015).

provided to SCAQMD staff at the start of the comment period. These should include the original emission calculation spreadsheets and modeling files (not the Adobe PDF files). Without all files and supporting air quality documentation, the SCAQMD staff will be unable to complete its review of the air quality analysis in a timely manner. Therefore, any delays in providing the all supporting documentation will require additional time for review beyond the end of the comment period.

Finally, the SCAQMD staff notes that impacts from toxic air contaminants during operations, mostly from trucks, were estimated using a screening-level analysis<sup>2</sup> developed by the San Joaquin Valley Air Pollution Control District (SJVAPCD). For projects that are sited within the SCAQMD's jurisdiction, cancer risk from mobile sources that use diesel fuel should follow the approved "Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions."<sup>3</sup>

Please provide the SCAQMD staff with written responses to all comments contained herein prior to the adoption of the Final MND. 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) 396-3302, if you have any questions regarding the enclosed comments.

Sincerely,

*Jillian Wong*

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<sup>2</sup> SJVAPCD Health Risk Screening Tool, 2011 (FirstCarbon Solutions, 2015).

<sup>3</sup>SCAQMD website: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis> .