



South Coast Air Quality Management District

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**Draft Mitigated Negative Declaration (Draft MND) for the Proposed
151-Unit Apartment Building Located at 959 E. Stadium Way for City of Los Angeles
(ENV-2015-1817-MND)**

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.

Project Description

The Lead Agency proposes construction of an approximately 162,500 square foot, six-story apartment building on an approximately 1.42 acre sized lot. The proposed building will include parking for 267 vehicles, 166 bicycles and will include four levels of parking. Soil disturbance activities will require approximately 59,250 cubic yards of soil export. The project site is currently vacant and steeply sloped. Construction is scheduled to start in 2017 with opening year in 2018.

SCAQMD Rule 1166

The Draft MND states that previous records indicate that six oil wells were located on the property. Based on the discussion in the Hazards and Hazardous Materials portion of the Draft MND,¹ the above-ground oil production equipment, storage tanks, etc., have been removed and the wells abandoned. Since the current state of the site's soil restoration is unknown, encountering soil contamination from petroleum hydrocarbons from the former oil and gas operations is likely. If contaminated soil is encountered during construction soil disturbance activities, compliance with SCAQMD Rule 1166 – Volatile Organic Compound Emissions From Decontamination of Soil is required and that compliance should be included in the Final MND.

Methane Gas Occurring Naturally and From Past Oil and Gas Operations

In addition, the project site is located within a designated Methane Zone² because methane gas could surface and accumulate from past oil and gas operations that occurred at the site. Although passive and intermittently operated active venting systems used at and around residential structures are currently exempt from SCAQMD permit rules,³ the SCAQMD staff recommends a discussion of what measures will be implemented to address any future methane emissions that might occur based on the project site's Methane Zone designation.

¹ DMND, Section VIII starting on page 31.

² *Ibid*, Page 4.

³ SCAQMD Rule 219 - Equipment Requiring a Written Permit (c)(10), Page 219-4.

Health Risk Assessment

The proposed residences will be sited less than 200 feet south of the I-5 Freeway.⁴ The I-5 Freeway has an average daily traffic volume of 297,000 vehicles which includes more than 19,780 diesel trucks.⁵ Numerous health studies have demonstrated potential adverse health effects associated with living near highly travelled roadways. Additional research has also shown that the near roadway environment also 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.⁶

Although the Draft MND includes mitigation per the building code⁷ requiring Minimum Efficiency Reporting Value (MERV) 13 or higher air filtration systems, there is no discussion of how this mitigation impacts the potential project's adverse air quality and health affect impacts from the freeway. The Final MND should show clearly disclose the unmitigated and mitigated (using the effectiveness of the proposed mitigation) results and compare them to the CEQA significance thresholds.

The SCAQMD staff also recommends that the Lead Agency conduct a health risk assessment (HRA) to disclose the potential health risks to the residents from the freeway. Guidance for performing a mobile source health risk assessment ("Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis") can be found at the SCAQMD website.⁸

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 concerns and any other air quality questions that may arise. If you have any questions regarding these comments, please contact Gordon Mize, Air Quality Specialist, at (909) 396-3302.

Sincerely,

Jillian Wong

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JW:CT:GM

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⁴ Aerial map inspection.

⁵ Caltrans website: <http://www.dot.ca.gov/trafficops/census/> 2014 Traffic Volumes Peak Month ADT at I-5/Stadium Way: The peak month ADT is the average daily traffic for the month of heaviest traffic flow. This data is obtained because on many routes, high traffic volumes which occur during a certain season of the year are more representative of traffic conditions than the annual ADT. 2014 Daily Truck Traffic I-5/Rte. 2: Truck Total percentage is 6.6% (both ahead and back legs are within 500 feet of the property site)

⁶ See Chapter 9 of the 2012 AQMP for further information. Accessed at: <http://www.aqmd.gov/aqmp/2012aqmp/Final-February2013/Ch9.pdf>

⁷ DMND, Air Quality and GHG Impact Analysis, Giroux & Assoc., April 25, 2016.

⁸ SCAQMD Website: Mobile Source Toxics Analysis <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.