



South Coast Air Quality Management District

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**Draft Mitigated Negative Declaration (Draft MND) for the Proposed
3022-3034 N Coolidge Ave & 2927-2935 Denby Ave; Silver Lake-Echo Park-Elysian Valley
(ENV-2016-586)**

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. The Lead Agency proposes the construction of 30 small lot joint living and working homes.

The SCAQMD staff is concerned that this proposed residential use is located within a commercial manufacturing zone (CM Zone) including at least two SCAQMD permitted facilities within one quarter mile. In addition, the proposed site is located just east of railroad tracks operated by the Southern California Regional Rail Authority (Metrolink) that are also used by trains operated by the Union Pacific Railroad. A federal database¹ indicates that these railroad tracks show daily train activity including approximately 83 trains powered by diesel-fueled locomotive engines. Diesel particulate matter emitted from diesel powered engines (such as trucks and locomotives) has been classified by the state as a toxic air contaminant and a carcinogen.

Since future residences of the proposed project would be exposed to toxic emissions from these nearby industries, the SCAQMD staff recommends that the Lead Agency estimate potential health risks to these future residents from these sources. Otherwise, the Lead Agency has not demonstrated that public health will not be significantly impacted by this project. 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.

Additionally, the Lead Agency failed to quantify the project's air quality emissions during both construction (demolition, grading, hauling) and operation. The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The SCAQMD recommends that the Lead Agency use this Handbook as guidance to prepare an air quality analysis in the Final MND. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720. More recent guidance developed since this Handbook was published is also available on SCAQMD's website here: www.aqmd.gov/ceqa/hdbk.html. SCAQMD staff also recommends that the lead agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the

¹ <http://safetydata.fra.dot.gov/OfficeofSafety/publicsite/crossing/xingqryloc.aspx>

California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: www.caleemod.com.

The proposed project is also adjacent to sensitive land uses² (i.e., residential dwellings south of the project site); however, the Draft MND did not evaluate potential localized air quality impacts that could result from construction of the proposed project. Therefore, the SCAQMD staff recommends that the Lead Agency revise the air quality analysis to include an assessment of potential localized air quality impacts during demolition and construction of the proposed project. These potential air quality impacts should be assessed using SCAQMD's Localized Significance Methodology and compared to the localized significance thresholds specific to the project area³. Furthermore, the Lead Agency should ensure that all future projects include a localized air quality analysis if warranted. In the event that the Lead Agency determines the proposed project will result in significant localized construction air quality impacts, the SCAQMD staff recommends that the Lead Agency require mitigation to minimize these impacts to a less than significant level. Additional construction-related air quality mitigation measures are available at: http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html

The SCAQMD staff is available to work with the Lead Agency to address these concerns and any other air quality questions that may arise. Please contact Jack Cheng, Air Quality Specialist at (909) 396-2448, if you have any questions regarding these comments. We look forward to reviewing and providing comments for the Final MND associated with this project.

Sincerely,

Jillian Wong

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JW:JC
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² 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>

³ The Localized Significance Threshold (LST) methodology and Mass Rate LST Look Up Table is available at: <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>