



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Mitigated Negative Declaration (MND) for the Bristol Parkway Mixed Use Development

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.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to construct six buildings totaling 801,119 square feet with 712 residential units and subterranean parking on 6.26 acres (Proposed Project). The Proposed Project is located approximately 450 feet from the Interstate 405 Freeway (I-405)¹. Construction is expected to take approximately 30 months beginning in as early as the third quarter of 2018².

SCAQMD Staff's Summary of Air Quality Analysis

In the Air Quality Analysis Section, the Lead Agency quantified the Proposed Project's construction and operation emissions and compared them to SCAQMD's regional and localized air quality CEQA significance thresholds. The Lead Agency found that the Proposed Project's air quality impacts would be less than significant. Additionally, due to the Proposed Project's proximity to I-405, the Lead Agency conducted a Health Risk Assessment (HRA) for information purposes only and proposed two mitigation measures as follows.

- Mitigation Measure AIR-2 requires the use of MERV 16 for on-site residential units.
- Mitigation Measure AIR-3 requires disclosure on potential health impacts to prospective residents from living in proximity to freeways and the reduced effectiveness of air filtration system when windows are open.

SCAQMD Staff's Comments

Filters have limitations. For example, in a study that SCAQMD conducted to investigate filters³, a cost burden is expected to be within the range of \$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 residents. It is typically assumed that the filters operate 100 percent of the time while residents are indoors or within their residential units and do not account for the exposures when the residents are in common space areas. In addition, these filters have no ability to filter out any toxic gases from vehicle exhaust. Therefore, in addition to the type of information that will be disclosed under Mitigation Measure AIR-3, SCAQMD staff recommends that the Lead Agency provide additional

¹ MND. Page 20.

² MND. Page A-18.

³ This study evaluated filters rated MERV 13 or better. Accessed at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf>. Also see also 2012 Peer Review Journal article by SCAQMD: <http://d7.iqair.com/sites/default/files/pdf/Polidori-et-al-2012.pdf>.

details on limitations of filters in the Final MND. At a minimum, the Final MND should include the following information:

- Disclosure on increased energy costs for running the HVAC system to prospective residents;
- Recommended schedules (e.g., once a year or every six months) for replacing the enhanced filtration units;
- Ongoing cost sharing strategies, if any, for replacing the enhanced filtration units;
- Identification of the responsible implementing and enforcement agency such as the Lead Agency for ensuring that MERV 16 filters are installed at on-site residential units before a permit of occupancy is issued;
- Identification of the responsible entity such as Homeowners Association or property management for ensuring filters are replaced on time, if appropriate and feasible;
- Criteria for assessing progress in installing and replacing the enhanced filtration units; and
- Process for evaluating the effectiveness of the enhanced filtration units at the Proposed Project.

Closing

Pursuant 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 the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, response should provide sufficient details giving reasons why specific comments and suggestions are not accepted. There should be good faith, 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 or useful to decision makers and to the public who are interested in the Proposed Project.

SCAQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact me at lsun@aqmd.gov if you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

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