



South Coast Air Quality Management District

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Draft Mitigated Negative Declaration (Draft MND) for the Proposed 7120 W Sunset Blvd. (1446 N Detroit St. & 7130 W Sunset Blvd.); Hollywood (ENV-2015-885)

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 a new five-story mixed-use residential dwelling with subterranean parking.

The proposed project is located immediately west of a Mobil gasoline station and northwest of a dry cleaning facility. Because of the close proximity to the existing gasoline station and dry cleaner, residents would be exposed to benzene and perchloroethylene (PERC), which are toxic air contaminants. The California Air Resources Board recommended in 2005 to avoid the siting of housing within 300 feet of a large gas station or dry cleaners in their Land Use Handbook.¹

The SCAQMD staff recommends that the Lead Agency discuss potential health risks to the proposed residents from the existing gasoline station and dry cleaner. Guidance for performing a gasoline dispensing station health risk assessment (“*Risk Assessment Procedures – Appendix X*”) can be found at: <http://www.aqmd.gov/docs/default-source/planning/risk-assessment/riskassprocjune15.pdf>. Guidance for performing a perchloroethylene dry cleaner health risk assessment (“*Emission Inventory and Risk Assessment Guidelines for Perchloroethylene Dry Cleaners*”) can be found at: <http://www.aqmd.gov/home/regulations/compliance/toxic-hot-spots-ab-2588/iws-facilities/iws-perc-dry-cleaning>

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 California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS.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

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>

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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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>