



# South Coast Air Quality Management District

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## **Notice of Intent to Adopt a Mitigated Negative Declaration for the 20401 Ventura Boulevard Project (Proposed Project)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to review the above-mentioned document. The City of Los Angeles is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff has provided a brief summary of the project information and prepared the following comments, which are organized by topic of concern.

### South Coast AQMD Staff's Summary of Project Information in the MND

Based on the MND, the Proposed Project is comprised of demolishing an existing building and constructing a 158,317 square foot building that includes a 156,917 square foot climate-controlled storage for household goods, a 1,015 square foot office space, 1,400 square foot commercial and retail spaces, and a parking lot. Based on a review of aerial photographs, South Coast AQMD staff found that the nearest sensitive receptor (e.g., assisted living facility) is 70 feet west of the project site. Construction of the Proposed Project is anticipated from October 2023 to May 2025. The Proposed Project is located on the project is located at 20401 Ventura Boulevard in Woodland Hills.

### South Coast AQMD Staff's Comments

*Quantifying the truck trips per day generated for the Proposed Project as the primary source of DPM during operation.*

CEQA requires the Lead Agency to prepare an analysis of vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, and automobile trips generated during operation. However, the South Coast AQMD staff could not obtain information regarding the project's truck trip generations and emissions associated with the trucks during operation. It is essential to clarify this information, as the frequency of truck trips directly correlates with DPM formations. South Coast AQMD staff recommend that the Lead Agency revise and identify the number of trucks potentially involved in the operational activities and include them in the Final MND. If it is not included in the Final MND, the Lead Agency should provide reasons for not supporting it by substantial evidence in the record.

*Warehouse Cold Storage Land Use and the Associated Emissions from Transport Refrigeration Units (TRU)*

The project description in the MND needs to explain whether the Proposed Project intends to allocate a portion of the warehouse land use for cold storage. Cold storage warehouses utilize more trucks and trailers equipped with TRUs than warehouses without cold storage. As a result, the Lead Agency is recommended to revise the project description in the Final MND to explain whether cold storage would be a part of the Proposed Project and provide an estimate for the number of TRU trucks and trailers associated with the operation of the warehouses with cold storage. If there are potential uses for TRUs, the Lead Agency is recommended to revise the calculations in the Final MND to quantify the emissions from the TRUs in addition to the operational truck emissions.

### *Health Risk Assessment (HRA) analysis*

In addition to the air quality impacts from the criteria air pollutants and greenhouse gases, the adverse air quality health risk impacts associated with increased emissions of toxic air contaminants (TACs) from all sources (including but not limited to expected future permitted stationary and portable sources, mobile sources, and other emission sources) during the operation phases need to be appropriately evaluated using qualitative and quantitative approaches to justify whether there will be potentially substantial adverse impacts. The MND for the Proposed Project must contain a comprehensive assessment of the health risks associated with mobile, stationary, and area sources during the operational and construction phases. Based on the MND, the nearest sensitive receptor, an assisted living facility, is located 70 feet west of the Proposed Project site. However, the potential cancer risk linked to the Proposed Project is unknown and undisclosed in the MND for the Proposed Project. The Lead Agency is recommended to conduct an operational HRA analysis. Evaluating truck emissions (including the truck routes to and from the site, truck loading/unloading docks, and their proximity to the sensitive receptors) and the impact of diesel-powered stationary and portable sources under the foreseeable probable future conditions should be included in the HRA analysis.

In the Air Quality Section in the MND, the Lead Agency argued, “SCAQMD recommends that HRAs be conducted for substantial individual sources of diesel particular matter (e.g., trucks stop and warehouse distribution facilities that generate more than 100 trucks per day or more than 40 trucks with operating transport refrigeration units)”<sup>1</sup>, and the Lead Agency references it as from South Coast AQMD Health Risk Assessment Guidance<sup>2</sup>. However, this written language is likely to be taken from California Air Resource Board (CARB) Air Quality and Land Use Handbook: A Community Health Perspective, under Table 1-1: Recommendations on Sitting New Sensitive Land Uses, and specifically for Distribution Centers<sup>3</sup>. The above statement and Table 1-1 are meant for advisory recommendations on sitting new sensitive land uses (e.g., residences, schools) near distribution centers and other land use types. The Lead Agency may misunderstand the above advisory recommendations from CARB Air Quality and Land Use Handbook because the Proposed Project is not a distribution facility. Therefore, not including an HRA based on the above statement is misused and is not reasonably explained. Moreover, if

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<sup>1</sup> DEIR, Page IV.A-72

<sup>2</sup> South Coast AQMD’s guidance for performing a mobile source health risk assessment can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.

<sup>3</sup> CARB Air Quality and Land Use Handbook can be found at: <https://www.arb.ca.gov/ch/handbook.pdf>.

there are potential uses for TRUs for the Proposed Project, the health risks associated with the TRUs will become a significant concern and the health risk impacts from TRUs should be also included in the analysis.

Consequently, an HRA is essential for determining the potential cancer risk impacts associated with the operation of the Proposed Project to the offsite sensitive receptors and workers so that they can be compared to the South Coast AQMD Air Quality Significance Thresholds for TACs<sup>4</sup> to determine whether there will be a potentially significant air quality impact. The analysis should also disclose the potential health risks from the Proposed Project's operation on residents living and workers outside the Proposed Project's boundary. Please refer to the South Coast AQMD's guidance for performing a mobile source health risk assessment.<sup>5</sup>

### *South Coast AQMD Air Permits and Role as a Responsible Agency*

If the implementation of the Proposed Project would require the use of new stationary and portable sources, including but not limited to emergency generators, fire water pumps, boilers, spray booths, and etc., air permits from South Coast AQMD will be required and the role of South Coast AQMD would change from a Commenting Agency to a Responsible Agency under CEQA. In addition, if South Coast AQMD is identified as a Responsible Agency, per CEQA Guidelines Sections 15086, the Lead Agency is required to consult with South Coast AQMD. In addition, CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of evaluating the applications for air permits. For these reasons, the Final MND should include a discussion about any new stationary and portable equipment requiring South Coast AQMD air permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project.

The Final MND should also include calculations and analyses for construction and operation emissions for the new stationary and portable sources, as this information will also be relied upon as the basis for the permit conditions and emission limits for the air permit(s). Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions regarding what types of equipment would require air permits. For more general information on permits, please visit South Coast AQMD's webpage at: <http://www.aqmd.gov/home/permits>.

### Conclusion

The Lead Agency is recommended to revise the CEQA analysis to address the aforementioned comments and provide the necessary evidence to sufficiently support the conclusions reached. If the requested information and analysis are not included in the final CEQA document, either the Final MND or other type of CEQA document, the Lead Agency should provide reasons for not doing so. Pursuant to California Public Resources Code Section 21092.5(b) and 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 and notify each public agency when any public hearings are scheduled. Please provide South Coast AQMD with

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<sup>4</sup> South Coast AQMD. Air Quality Significance Thresholds. <https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf>

<sup>5</sup>South Coast AQMD's guidance for performing a mobile source health risk assessment is available at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.

written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided. In addition, if the Lead Agency decides to adopt the Final MND, please provide South Coast AQMD with a notice of any scheduled public hearing(s).

Thank you for the opportunity to provide comments. South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Sahar Ghadimi, Air Quality Specialist, at [sghadimi@aqmd.gov](mailto:sghadimi@aqmd.gov) should you have any questions.

Sincerely,

*Sam Wang*

Sam Wang

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