



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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Draft Environmental Impact Report (Draft EIR) for the Proposed Shadowbox Studios Project [Master Case 21-109] (Proposed Project)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The City of Santa Clarita is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. The following comments include recommended revisions to the project-level air quality mitigation measures, operational emissions from stationary and portable sources, Localized Significant Thresholds (LSTs) for construction and operational emissions analysis, health risk impacts during operation, and information about South Coast AQMD air permits that the Lead Agency should include in the Revised Draft EIR or the Final EIR.

South Coast AQMD Staff's Summary of Project Information in the Draft EIR

Based on the Draft EIR, the Lead Agency proposes construction of a 1,294,500 square-foot film and television studio campus on a currently vacant 93.5-acre parcel of land.¹ The Proposed Project is located near the northeast corner of Railroad Avenue and 13th Street in Santa Clarita. The overall site includes approximately: 1) 476,000 square feet of sound stages; 2) 571,000 square feet of workshops, warehouses and support uses; 3) 210,000 square feet of production and administrative offices; and 4) 37,500 square feet of catering and other specialty services.² Additionally, the Proposed Project seeks to build a bridge across Placerita Creek to provide employee access to a graded parking area located on the north side of Placerita Creek.³ Based on a review of aerial photographs, South Coast AQMD staff finds that the nearest sensitive receptor (e.g., residence) is located within 25 feet north of the Proposed Project. The construction period is anticipated to last 25 months, which is expected to begin in 2023 and end in 2025.⁴

South Coast AQMD Staff's Comments on the Draft EIR

Operational Emissions from Stationary and Portable Sources

The Draft EIR states that operational criteria pollutant emissions are expected from the use of stationary source, six emergency generators operating four hours per day.⁵ However, given the

¹ Draft EIR, p. ES-1.

² Ibid. p. 1.

³ Ibid. p. 1.

⁴ Ibid. p. 26.

⁵ Ibid. p. 4.2-19.

Proposed Project's expansive scale, additional stationary and/or portable sources, which may include but are not limited to internal combustion engines, boilers, and spray booths, are typical equipment that would likely be utilized within the film and television studio campuses. Failing to account for these additional potential operational stationary and portable sources and the associated emissions in the analysis could lead to an underestimation of the total operational emissions.

Furthermore, upon examination of the Excel file titled "Generator and Food Truck Assumptions," provided by the Lead Agency, the "Max Generator Emissions – Daily" values were multiplied by 12 to derive the "Max Generator Emissions - 4 hours" without providing the basis, equations and documentation supporting the reasoning behind the math. As such, staff was not able to determine how the total annual DPM emissions were calculated. Therefore, the Lead Agency is recommended to provide further clarification and supporting documentation regarding the calculation methodology for determining the operating hours of the emergency generator and quantifying the projected emissions.

Localized Significant Thresholds (LSTs) Analysis for Construction and Operational Activities

The Draft EIR contains an LST analysis of localized air quality construction and operation impacts to sensitive receptors in the vicinity of the Proposed Project as presented Appendix C – Air Quality and Greenhouse Gas Emissions Study,⁶ Table 8 - Onsite Construction Emissions and Table 9 - Onsite Operation Emissions. The localized emissions were determined by relying on the Mass Rate LST Look-up Tables developed by South Coast AQMD.⁷ However, based on aerial maps provided in the Draft EIR, the footprint of the Proposed Project spans approximately 93.5 acres, which is substantially larger than the allowed maximum footprint of five-acres in the Mass Rate LST Look-up Tables. In addition, it appears that the closest sensitive receptor (residence) is located adjacent to or within 25 feet north of the Proposed Project site but the Draft EIR relied upon emission screening criteria based on a distance of 82 feet (25 meters) for a five-acre site.⁸ To remedy these inconsistencies, a re-evaluation of the localized construction and operational emissions by conducting air dispersion modeling, in lieu of relying on the Mass Rate LST Look-up Tables, is more appropriate for accurately predicting the ground-level concentrations needed for the LST analysis because air dispersion modeling takes into account project-specific factors such as: 1) the total acreage to be disturbed; 2) building downwash effects; 3) emissions and location of expected mobile sources, permitted sources, and other sources on-site.

Therefore, South Coast AQMD staff recommends that the Lead Agency revise the LST analyses for project construction and operation by conducting air dispersion modeling and including the results of this analysis in either a Revised Draft EIR or Final EIR. If a revised LST analysis is not included in the Revised Draft EIR or Final EIR, the Lead Agency should provide reasons supported by substantial evidence in the record to explain why.

⁶ Appendix C Air Quality and Greenhouse Gas Emissions Study. Page 37.

⁷ South Coast AQMD, Mass Rate LST Look-up Tables: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/appendix-c-mass-rate-1st-look-up-tables.pdf>

⁸ Draft EIR. p. 4.2-13.

Health Risk Assessment (HRA) during Project Operation

CEQA Guidelines Sections 15126.2 and 15126.4 require a Draft EIR to include a description of the significant environmental effects of a Proposed Project, significant environmental effects which cannot be avoided, significant irreversible environmental changes, growth-inducing impacts, and mitigation measures proposed to minimize the significant adverse impacts. An impact is considered significant under CEQA if it leads to a “substantial, or potentially substantial, adverse change in the environment.” 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/or quantitative approaches to justify whether there will be potentially substantial adverse impacts.

However, the Draft EIR for the Proposed Project did not contain a comprehensive assessment of the health risk associated with mobile, stationary and portable sources during the operation phase. Please refer to the South Coast AQMD’s guidance for performing a mobile source health risk assessment.⁹ As a result, the potential cancer risk linked to the Proposed Project is unknown and undisclosed. This omission is concerning because the operation of a film and television studio campus is expected to involve various diesel-powered stationary and portable sources and vehicles that emit Diesel Particulate Matter (DPM), known as an air toxic and carcinogen. According to n Table 4 in the Transportation Assessment of the Draft EIR,¹⁰ the total net new vehicle trips are 605 and 684 in the morning and the afternoon peak hours, respectively during operation of the Proposed Project. However, the Draft EIR did not mention how many of these truck trips are used for daily operations. Therefore, the Lead Agency is recommended to revise and identify the number of trucks potentially involved in the operational activities and include them in the Revised Draft EIR or Final EIR. If this additional information is not included in the Revised Draft EIR or Final EIR, the Lead Agency should provide reasons supported by substantial evidence in the record to explain why.

As mentioned earlier in this letter, the aerial maps indicate that the nearest sensitive receptor, a residential area, is located adjacent to or within 25 feet north of the Proposed Project site. As such, the Lead Agency is recommended to conduct an operational phase HRA, which should include 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. An HRA assessment 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 TACs¹¹ to determine whether there will be a potentially significant air quality impact. The analysis should also disclose the potential health risks for chronic and acute impacts of the Proposed Project’s

⁹ 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>.

¹⁰ Transportation Assessment, Table 4, p. 25.

¹¹ South Coast AQMD. Air Quality Significance Thresholds. <https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf>

operation on residents living and/or workers working outside the Proposed Project's boundary in the Revised Draft EIR or Final EIR. If an HRA is not included in the Revised Draft EIR or Final EIR, the Lead Agency should provide reasons supported by substantial evidence in the record to explain why.

South Coast AQMD Air Permits and Responsible Agency Role

If construction of the Proposed Project requires using the 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. The Revised Draft EIR or Final EIR should include a discussion on stationary and portable equipment requiring South Coast AQMD permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project. Any assumptions used for the stationary and portable sources in the Revised Draft EIR or the Final EIR will also be used as the basis for the permit conditions and limits for the Proposed Project. Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions relative to air permits. General information on air permits is also available on South Coast AQMD's webpage at: <http://www.aqmd.gov/home/permits>.

Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), the Lead Agency is required to provide South Coast AQMD written responses to all comments contained herein at least 10 days prior to certifying the Revised Draft EIR or the Final EIR. In addition, as provided by CEQA Guidelines Section 15088(c), if the Lead Agency's position is at variance with the recommendations provided in this comment letter, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided.

We appreciate the opportunity to review the Proposed Project. Thank you for considering these 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 should you have any questions.

Sincerely,

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Planning, Rule Development & Implementation

SW:SG:BR

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