



# South Coast Air Quality Management District

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SENT VIA E-MAIL:

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Case Numbers: CPC-2021-2642-SP and ENV-2021-2643-EIR

200 N. Spring Street, Room 667

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**Notice of Availability of a Draft Environmental Impact Report (EIR) for  
the Proposed Cornfield Arroyo Seco Specific Plan (CASP) Project (SCH# 2021040206)  
(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 Los Angeles is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. The following comments include completion of CEQA air quality impact analysis during operational activities, additional air quality mitigation measures recommended for construction, overlapping construction and operational activities, and information about South Coast AQMD rules and permits that the Lead Agency should include in the Final EIR.

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

The Lead Agency envisions development of the Proposed Project to align local and regional development objectives, thereby fostering more affordable housing choices and ensuring stability of the existing vulnerable communities.<sup>1</sup>

Based on the Draft EIR, the Proposed Project consists of proposed updates to the City of Los Angeles' CASP. This includes new land use and zoning regulations, incentives, and boundaries for the future construction of residential units on 600 acres land.<sup>2</sup> The Proposed Project is bounded by Cypress Park to the north, Lincoln Heights to the east, Main Street to the south, and Chinatown to the west.<sup>3</sup> For this Draft EIR, the development of the proposed growth identified in the Specific Plan is assumed to occur by the horizon year of 2040.<sup>4</sup>

**South Coast AQMD Staff's Comments**

*Completion of CEQA Air Quality Impacts Analysis During Operation Activities*

Based on the Draft EIR, the lead agency has not provided any analysis for emissions for localized significant thresholds (LSTs) for operation. The lead agency has stated that the Draft EIR does not contain analysis on LSTs for operational, citing the absence of project-level data for the Proposed Project. Nevertheless, even though the precise projects have yet to be defined,

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<sup>1</sup> Draft EIR, p. 74.

<sup>2</sup> Ibid. p. 75.

<sup>3</sup> Ibid. p. 75.

<sup>4</sup> Ibid. p. 15.

in pursuant to CEQA guidelines section 15064 -Determining the Significance of the Environmental Effects Caused by a project – the lead Agency is responsible for performing an in-depth and detailed analysis of an estimation of the potential localized and regional air quality impact analysis. Thus, it is recommended to add a table in the air quality impact section for evaluating the maximum daily on-site operational emissions using CalEEMod<sup>5</sup> land use emissions software, and subsequently, compare these emissions against the South Coast AQMD LSTs. It is important to note that the localized analysis can be conducted either by using the LST screening tables or by performing dispersion modeling. This analysis will provide us with a preliminary assessment of the potential air quality impacts, both at the regional and localized levels, arising from the Proposed Project.

#### *Air Quality Mitigation Measures for NOx and PM Emissions from Construction*

Given the long-range plan of the Proposed Project from 2023-2040, Tier 4 technology may not be the cleanest technology when construction occurs later for individual projects. According to the CARB Strategies for Reducing Emissions from Off-Road Construction Equipment, the implementation of off-road Tier 5 starting in 2027 or 2028 and the Governor's Executive Order in September 2020 requires CARB to develop and propose a full transition to Zero Emissions (ZE) by 2035.<sup>6</sup> Considering the scope of the project, it is crucial to ensure that the levels of construction emissions, specifically NOx and PM<sub>10</sub>, remain below significant thresholds during the construction period for each proposed individual project. Moving towards achieving this goal, where feasible, involves opting for electric emission-free engines instead of diesel-fueled engines for the construction equipment. This proactive choice not only aligns with environmental concerns but also demonstrates a commitment to minimizing the project's environmental footprints. The abatement of NOx can also be pursued by enforcing greener constructions, such as, limiting the usage of older engines in favor of adopting the latest available technologies, or even incorporating exhaust retrofits such as cutting-edge exhaust aftertreatment techniques. Additionally, several other resources to assist the Lead Agency with identifying additional potential mitigation measures for the Proposed Project are included in the South Coast AQMD's CEQA Air Quality Handbook<sup>7</sup> for both operational and construction emissions.

#### *Overlapping Construction and Operational Activities*

Even though the Proposed Project consists of approximately a total of 600 acres of land over the course of 17-year construction, the Draft EIR does not analyze the scenario of overlapping between the construction and operational activities. Therefore, South Coast AQMD staff recommends that the Lead Agency revise the air quality analysis section to consider the overlapping construction and operation. The estimated overlapped emissions should then be compared to South Coast AQMD's regional air quality CEQA operational thresholds to determine their level of significance, which should be included in the Final EIR. If the overlapped emissions analysis is not included in the Final EIR, the Lead Agency should provide reasons for not having them supported by substantial evidence in the record.

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<sup>5</sup> CalEEMod is available free of charge at:  
[www.caleemod.com](http://www.caleemod.com).

<sup>6</sup> Presentation can be found at:  
<http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/combined-construction-carb-amp-aqmp-presentations-01-27-21.pdf>

<sup>7</sup> <https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>

*South Coast AQMD Permits and Responsible Agency*

If the implementation of the Proposed Project would require the use of new stationary equipment (e.g., internal combustion engines), permits from South Coast AQMD are required. The Final EIR should include a discussion on any existing and new stationary 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 sources in 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 on permits. For more general information on permits, please visit South Coast AQMD's webpage at: <http://www.aqmd.gov/home/permits>.

Conclusion

According to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the Draft EIR for adoption together with any comments received during the public review process. Please provide South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. When the Lead Agency's position is at variance with recommendations raised in the comments, the issues raised in the comments should be addressed in detail, giving reasons why specific comments and suggestions are not accepted. There should be good faith and 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, informative, or useful to decision-makers and the public who are interested in the Proposed Project.

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](mailto:sghadimi@aqmd.gov) should you have any questions.

Sincerely,

*Sam Wang*

Sam Wang

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SW:SG

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