



South Coast Air Quality Management District

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Draft Environmental Impact Report (Draft EIR) for the Proposed Sea Breeze Apartments

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document. The following comment is meant as guidance for the Lead Agency and should be incorporated into the Final CEQA document.

In the project description, the lead agency proposes to build two structures with a maximum height of six stories to house 352 multi-family residential units with above-ground parking. Building construction would include 661,168 total gross square feet on a 5.12 acre vacant, paved lot. Site preparation will include surface grading and minimal excavation for the foundation and utilities.

In the Draft EIR, the lead agency proposes a residential project on property that is currently zoned as Heavy Industrial, with the previous land use including a used car auction operation, a warehouse distribution operation building, and two office buildings. The proposed multi-family residential site is currently surrounded by industrial and commercial uses, and a family fun center. Single-family residences are located south of Sepulveda Boulevard. The Draft EIR also describes an "Add Area" located on vacant land adjoining the project site to the south. The Draft EIR states that this proposed Add Area could be subject to a future General Plan Amendment by the lead agency to change the land use designation from the current Heavy Manufacturing to Neighborhood Commercial. However, the project description on page II-36 indicates that the current zoning would remain unchanged until a specific development application would be considered. Under this wording, there appears to be leeway for a project to be approved (or to be developed "by right") with the zoning left unchanged. Without a specific commitment to changing the designation to Neighborhood Commercial in the Draft EIR, the possibility of the residences living next to additional potentially incompatible land uses with their associated air quality and health effect impacts remains a real possibility and must be analyzed under CEQA.

In addition, the proposed project site is currently bordered by industrial warehouses and offices to the north and east. As stated in the Draft EIR, “The M3 zone is the most intensive of the City’s various zones and allows for uses that may be obnoxious or offensive by reason of emission of odor, dust, smoke, gas, noise vibration and the like” (Page IV.D-18). The Draft EIR further states “Other obnoxious or intolerable characteristics associated with industrial and manufacturing lands could include trucks, machinery, hazardous waste, and exhaust, among many other things. These side effects associated with uses in the M3 zone would create an incompatibility between the residential uses and adjacent land” (Page IV.D-22). The Draft EIR therefore concludes that there is a significant and unavoidable impact of the project with respect to land use incompatibility. AQMD staff agrees with this conclusion.

However, it is not clear how the Draft EIR can also conclude that there is a less than significant impact to sensitive receptors from surrounding sources of air pollution without a Health Risk Assessment that quantifies cumulative impacts from all surrounding permitted and unpermitted sources within a quarter-mile radius. Similarly, while potential odor impacts are mentioned in the land use chapter of the Draft EIR, they are not addressed in the air quality chapter. Because the surrounding zoning permits heavy manufacturing uses, it is also unclear how the residents at the project site may deal with future industrial activities in the surrounding community. AQMD staff requests that these potential incompatible land use concerns related to air quality be addressed prior to publishing the Final EIR.

Pursuant to Public Resources Code Section 21092.5, please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final Environmental Impact Report. The AQMD staff is available to work with the Lead Agency to address these issues and any other air quality questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,



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IM:GM

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