



South Coast Air Quality Management District

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January 20, 2015

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Draft Environmental Impact Report (Draft EIR) for the Proposed MGA Mixed-Use Campus Project Located at 2000 W. Prairie Street, Chatsworth (SCH NO. 2014041066)

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 EIR. In the project description, the Lead Agency proposes to demolish select structures, grade and construct approximately 1.22 million square feet of mixed use buildings.

In the Project Description of the DEIR, the Lead Agency proposes to develop a corporate and residential mixed-use campus totaling 1,212,515 square feet. However, Appendix C - CalEEMod calculations only accounts for 969,815 square feet. The total square footage used throughout the Draft EIR is inconsistent and the Lead Agency should update the total square footage used in the Air Quality analysis in the Final EIR.

Additionally, the Lead Agency should clarify the proposed land use. The Project Description states that the proposed project will include light industrial functions; whereas, Appendix C – CalEEMod modeling does not incorporate any industrial land use types. The Lead Agency should ensure that a consistent land use is used throughout the Final EIR.

In Appendix C - Section 3.4 Methodology and Significance Criteria, the Lead Agency states that demolition will take approximately 4 weeks and 170,500 cubic feet of debris will be generated. It is unclear if this assumption is inclusive of the bridge demolition activities as well as how debris volumes were calculated. Furthermore, bridge demolition, bridge grading, and project grading hauling emissions were not calculated in CalEEMod. SCAQMD staff recommends that the Lead Agency provide additional information and revise the CalEEMod calculations to include bridge demolition and project grading activities in the Final EIR.

According to the Localized Significance Threshold (LST) analysis, during construction, no more than 1.5 acres would be disturbed per day. It is unclear how the Lead Agency determined the threshold to use. LST values are not to be interpolated from the Mass Rate LST Look-Up Table¹. The Lead Agency should use the mass look up table for a 1-acre site (since the area of disturbance is no more than 1.5 acres) or perform dispersion modeling using AERMOD to analyze the project's localized impacts from construction. SCAQMD staff recommends the Lead Agency revise the LST analysis in the Final EIR.

¹ 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>

Based on the historical use of the proposed project, the SCAQMD staff is concerned about the potential air quality impacts from VOC contaminated soils. Disturbing soils that may contain petroleum hydrocarbons are subject to the requirements of SCAQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil. The Final EIR should be revised to address Rule 1166 if VOC contaminated soils are encountered.

Additional Mitigation Directed to Reduce Mobile Source Emissions

Electric Vehicle (EV) Charging Stations

Vehicles that can operate at least partially on electricity have the ability to substantially reduce the significant NOx impacts from this project. It is important to make this electrical infrastructure available when the project is built so that it is ready when this technology becomes commercially available. The cost of installing electrical charging equipment onsite is significantly cheaper if completed when the project is built compared to retrofitting an existing building. Therefore, the SCAQMD staff recommends the Lead Agency require the proposed project to be constructed with the appropriate infrastructure to facilitate sufficient electric charging for vehicles to plug-in. Similar to the City of Los Angeles requirements for all new projects, the SCAQMD staff recommends that the Lead Agency require at least 5% of all vehicle parking spaces include EV charging stations.^[2] At a minimum, electrical panels should appropriately sized to allow for future expanded use.

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 EIR associated with this project.

Sincerely,

Jillian Baker

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LAC 141209-10
Control Number

^[2] http://ladbs.org/LADBSWeb/LADBS_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf