



# South Coast Air Quality Management District

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## **Draft Environmental Impact Report (DEIR) for the Proposed Downtown Hawthorne Specific Plan (DHSP) (SCH # 2015021074)**

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 CEQA document.

### Project Description

In the DEIR, the Lead Agency proposes development within five land use areas totaling approximately 786 areas or 1.23 square miles. The five designated areas include residential, commercial, hospitality, mixed-use and public/quasi-public areas. In addition, four sites have been identified for new development and investment. These four sites have been designated as Transformative Projects and include the Hawthorne Mall, Civic Center, South Bay Ford and St. Joseph's Plaza. The proposed DHSP's boundaries include the I-105 Freeway on the north, Prairie Avenue, Freeman Avenue and its extension through residential neighborhoods to the city limits on the south, and Ramona Avenue and Inglewood Avenue on the west.

### Health Risk Assessment for Siting Sensitive Receptors Near Sources of TACs

Based on the DHSP Land Use Diagram (Figure 2-4) in the DEIR, the planning areas include sensitive receptors (residences) located near the I-105 Freeway, which could expose any new sensitive receptors to pollutants due to existing ambient air pollution in the vicinity including Toxic Air Contaminants (TACs), which are carcinogenic. On page 102 in the Air Quality Section of the DEIR, the Lead Agency discusses TACs but does not commit to future CEQA analysis including the potential risk to possible new sensitive receptor uses near other source of TACs. The Lead Agency reasons that the amount of locomotive traffic and any truck emissions (including truck idling) would not result in significant impacts from those TAC sources. The SCAQMD staff is concerned, however, that the potential impacts from all sources of TACs must be quantified to substantiate a Lead Agency's significance determination regarding cancer risks to potential sensitive receptors. In addition, all sources of TACs should be considered in future analyses. In addition to the freight trains mentioned in the DEIR, new sensitive receptors could also be exposed to TACs from existing stationary and mobile sources located near new sensitive receptors. A Health Risk Assessment (HRA) should therefore be conducted to assess and disclose health risks to new sensitive receptors sited within a quarter mile of stationary sources (e.g., dry cleaning, auto-body repair, fueling station businesses, etc.) and within 500 feet of mobile sources (i.e., vehicles operating on the I-105 Freeway) that produce TACs. Otherwise, a future CEQA document prepared by the Lead Agency will not have substantiated its findings that involve siting new sensitive receptors near sources that produce TACs.

Guidance for assessing toxic risk from stationary and mobile sources are available at the SCAQMD website.<sup>1</sup>

CARB Guidance for Siting Sensitive Receptors Near a Freeway

In the Draft EIR, the Air Quality Section discusses the California Air Resources Board's (CARB) responsibilities and mission. Since new sensitive receptors could be located by near the existing I-105 Freeway, the Final EIR should include a discussion of CARB's advisory recommendation concerning this potential scenario. In the CARB Air Quality and Land Use Handbook: A Community Perspective,<sup>2</sup> CARB recommends to avoid siting new sensitive receptors within 500 feet of a freeway or urban roads with 100,000 vehicles per day. In the DHSP Land Use Diagram (Figure 2-4), some residential uses are shown within 500 feet of the I-105 Freeway, which has traffic activity of approximately 150,000 daily vehicles in a worst-case peak month scenario including approximately 5,160 trucks operating daily.<sup>3</sup> Future CEQA documents should discuss this CARB guidance and also include a HRA to determine the potential cancer risk to new sensitive receptors that might be located within 500 feet of the freeway. Then, if significant impacts are determined, mitigation should be incorporated into the project description and applicable air quality analysis to reduce those impacts to less than significant levels.

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

Sincerely,

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LAC151223-04  
Control Number

JW:GM

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<sup>1</sup> Mobile source Toxic Analysis: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis> ; Stationary Source Risk Assessment: <http://www.aqmd.gov/home/permits/risk-assessment> .

<sup>2</sup> California Air Resources Board. April 2005. "Air Quality and Land Use Handbook: A Community Health Perspective." Accessed at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/california-air-resources-board-air-quality-and-land-use-handbook-a-community-health-perspective.pdf?sfvrsn=0> .

<sup>3</sup> <http://traffic-counts.dot.ca.gov/> : 2014 Traffic and Truck Volumes 150,000 back peak month (Route 105/Los Angeles, Junction Route 405), the worst-case peak traffic amount that future sensitive receptors would be exposed to along with the truck percentage total (150,000 daily vehicles times 0.0344 equals 5,160 daily trucks taken from the East Leg, Los Angeles/Junction Route 405).