



South Coast Air Quality Management District

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**Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) for the
Proposed 78-Hotel Room Addition to the Existing Four-Story, 96-Room Hotel
Project Located at 5628 N. Sepulveda Blvd in Van Nuys (ENV-2014-1436)**

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.

The Lead Agency proposes to add 78-rooms to an existing hotel. The proposed addition would total approximately 48,000 square feet and include three levels subterranean parking for an additional 146 spaces added to the existing hotel. Approximately 6,000 cubic yards of soil and asphalt will be exported.

The Final MND should analyze project regional and localized air quality impacts for construction and operations. In the air quality section on page 20, the lead agency determined that project construction and operational air quality impacts were less than significant by relying on the screening tables in Chapter 6 of the SCAQMD's 1993 CEQA Air Quality Handbook but did not quantify the proposed project's air quality impacts. Since these tables do not account for soil disturbance activities including excavation or localized impacts to surrounding sensitive receptors and use now outdated mobile source emission factors, relying solely on these tables does not demonstrate that short- and long-term air quality impacts are below significance threshold levels. Rather, the SCAQMD staff recommends that project impacts be quantified and compared with recognized significance thresholds in the Final MND in order to demonstrate the lead agency's determination that project impacts are less than significant.

For estimating regional and localized project impacts, the current California Emission Estimator Model (CalEEMod) ¹ land use emissions model is available that can quantify potential project criteria pollutant and also greenhouse (GHG) emissions. Project emissions can also be estimated by following the calculation methodologies in Chapter 9 and the Appendix to Chapter 9 in the South Coast SCAQMD's CEQA Air Quality Handbook. ² Should the lead agency conclude after its analyses that construction or operational air quality impacts exceed the SCAQMD daily significance thresholds, staff has compiled mitigation measures ³ in addition to the mitigation included in the Draft MND starting on page two of the Draft MND to be implemented if the air quality impacts are determined to be significant.

Localized air quality impacts should also be evaluated since sensitive receptors (single- and multi-family residences) are located within a quarter mile of the project site, east of the project site and would potentially be adversely impacted by the construction and excavation activities occurring at the site. SCAQMD guidance for performing a localized air quality analysis can also be found at the SCAQMD website. ⁴

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final MND. The SCAQMD 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 these comments.

Sincerely,

Jillian Baker

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JB:GM

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¹ <http://www.aqmd.gov/ceqa/models.html>

² <http://www.aqmd.gov/ceqa/hdbk.html>

³ http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html

⁴ <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>