



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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**Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) for the
Proposed Four-Story, 24-Unit Multi-Residential Building With Subterranean
Parking Project Located at 18529 W. Calvert Street in the Reseda Area in Los
Angeles (MND-NG-15-178-PL; ENV-2014-3869)**

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.

In the project description, the Lead Agency proposes to demolish one single-family residence structure and then construct a four-story, 24-unit multi-family residential building with subterranean parking on an approximately 16,561 square foot (0.38 acre) site. The project will require removal an unknown quantity of demolition debris and soil export from excavation of the garage and other soil disturbance. The estimated construction start and completion dates were not included in the Draft IS/MND.

On page eight in the Air Quality Section, the Lead Agency determined that short-term project activities would result in less than significant impacts to nearby residences with mitigation without quantifying the air quality impacts. Instead, the Lead Agency refers on page 15 to the screening tables in the SCAQMD CEQA Air Quality Handbook (Handbook). The SCAQMD staff, however, has not supported the use of the Handbook screening tables for a number of years because the screening tables were based on now outdated mobile source emission factors and trip rates; the tables also do not account for emissions from excavation; and they do not account for the localized significance threshold impacts that could affect the neighboring residents or other potential sensitive receptors. Therefore, the Lead Agency should quantify project air quality impacts to demonstrate that the proposed project will not generate significant adverse construction air quality impacts that may trigger further analysis pursuant to the California Environmental Quality Act. The SCAQMD staff recommends that the Lead Agency estimate project air quality impacts using the current California Emission Estimator

Model (CalEEMod).¹ CalEEMod is a statewide land use emissions model that can quantify potential project criteria pollutant and greenhouse (GHG) emissions. The Lead Agency can also estimate project emissions 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 measures³ in addition to Mitigation Measure III-10 cited in the Air Quality Section narration on page 15. Although Mitigation Measure III-10 is cited, the measure is not included with the other measures on page two or elsewhere in the Draft IS/MND. Further, page 15 also refers to compliance with SCAQMD Rule 403 (Fugitive Dust). The Lead Agency is reminded that complying with a law, rule, e.g., SCAQMD Rule 403 (Fugitive Dust), regulation, etc., is not considered mitigation because it is a requirement. Instead, the Final MND should include the specific measures from SCAQMD Rule 403 and incorporate those specific measures into each applicable air quality analysis to demonstrate that the Lead Agency's findings.

Besides the general emission impacts based on the project description, the project specific emission estimates should also include haul truck and associated emissions during demolition and soil export from trucks carrying debris and excavated soil from the project site to a disposal area(s). Basic assumptions used to estimate those emissions, e.g., the number and types of daily haul trucks, distance(s) to the haul site(s), etc., should also be included. Further, the Lead Agency should describe compliance with SCAQMD rules and regulations including, but not limited to, Rule 1403 - Asbestos Emissions from Demolition/Renovation Activities and Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil should the demolition include materials that contain asbestos (Rule 1403) or Volatile Organic Compounds (VOC) are encountered during excavation (Rule 1166).

It is also recommended that the Lead Agency evaluate localized air quality impacts since it is noted on page three of the Draft IS/MND and in an aerial map inspection, the proposed project is located within one-quarter mile of sensitive receptors (single- and multi-family residences) surrounding the proposed project site. Therefore, the SCAQMD staff requests that the Lead Agency evaluate localized air quality impacts to ensure that any nearby sensitive receptors are not adversely affected by the construction activities that are occurring in close proximity. SCAQMD guidance for performing a localized air quality analysis can also be found at the SCAQMD website.⁴

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

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

³ <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>

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

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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,

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