



South Coast Air Quality Management District

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**Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) for the
Proposed Five-Story, 91-Unit Residential Building With Subterranean Parking
Project Located at 1011-1031 S. Serrano Avenue in the Wilshire Area in Los
Angeles (MND-NG-15-172-PL; ENV-2014-3973)**

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 build a five-story, approximately 83,415 square foot, 91-unit residential building. Parking will be located in a two level subterranean parking structure that will include 110 parking spaces. The proposed project is located on a five-lot, approximately 31,050 square foot (0.71 acre) site. The project will also require approximately 30,000 cubic yards of soil export resulting 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 nine in the Air Quality Section, the Lead Agency determined that project air quality impacts would result in less than significant impacts to nearby residences during construction activities but did not quantify project air quality impacts for short-term activities. Without quantifying project air quality impacts, the Lead Agency has not demonstrated 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. Therefore, the SCAQMD recommends that the lead agency demonstrate that project impacts are less than significant in the Final MND by estimating construction 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

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

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 the measures described in the Air Quality Section narration starting on page 17. The Lead Agency is reminded, however, that complying with a law, rule, e.g., SCAQMD Rule 403 (Fugitive Dust), regulation, etc., is not considered mitigation because it is a requirement. Rather, the Final MND should include the specific measures from SCAQMD Rule 403 in the Final MND 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 emissions during soil export from trucks carrying soil from the site to soil disposal area(s) along with the basic assumptions used to estimate those emissions, e.g., the number and types of of daily haul trucks, distance(s) to the haul site(s), etc.

It is also recommended that the lead agency evaluate localized air quality impacts since it is noted on page four of the Draft IS/MND and in an aerial map inspection, the proposed project is located within one-quarter mile of sensitive receptors (multi-family residences) south, east and west of the proposed project. Therefore, the SCAQMD 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

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 Wong

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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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