



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Draft Mitigated Negative Declaration (Draft MND) for the Proposed 70,310 Square Foot Mixed-Use Project Located at 1021-1033 & 1047-1051 S. Abbot Kinney Boulevard & 1011 S. Electric Avenue in the Venice Area of the City of Los Angeles (ENV-2012-3355)

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 project description, the Lead Agency proposes the partial demolition of the existing land uses and construction of new uses on an approximately 1.01-acre site. Demolition activities include: 1) 2,442 square feet of the total restaurant space; 2) the entire 1,572 square foot pre-school; 3) 2,200 square feet of the total office space; as well as the existing parking lot. After demolition is completed, construction will begin for three free-standing, three-story buildings and one new two-story building. The proposed project includes approximately 70,310 square feet of proposed and existing uses: new (63,964 square feet) and existing (6,346 square feet). The new construction uses will include a 50,880 square foot 80-room hotel; four apartment units totaling 2,588 square feet; three restaurants totaling 9,202 square feet; 4,269 square feet of retail; 3,371 square feet of offices; and at-grade and subterranean parking for 166 vehicles and 56 bicycles. The proposed project will also require soil export activities to excavate and haul away approximately 9,318 cubic yards of soil. Details including the amount of demolition debris, demolition and soil export haul trips, vehicle miles traveled to the demolition debris and soil disposal site(s) were not included in the Draft MND. The approximate project start date, phasing and project completion date were also not included in the Draft MND.

Air Quality Analyses

The Lead Agency has determined that project air quality impacts would result in less than significant impacts during construction and operation activities but did not quantify short- or long-term air quality emissions. Without quantifying project air quality impacts, the Lead Agency has not demonstrated that the proposed project will not generate significant adverse construction or operational air quality impacts that may trigger further analysis pursuant to the California Environmental Quality Act. Therefore, the SCAQMD staff recommends that the Lead Agency demonstrate that project impacts are less than significant in the Final MND by estimating short- and long-term 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 Handbook².

It is also recommended that the Lead Agency evaluate localized air quality impacts since it is noted in an aerial map inspection and in the environmental settings section on page 12 that the proposed project is located within one-quarter mile of sensitive receptors (single and multi-family residences) north, south and east of the project site. Therefore, the SCAQMD staff recommends 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 website³. 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 measures⁴ to be implemented, in addition to the measures listed starting on page three in the Draft MND, if the air quality impacts are determined to be significant.

Compliance With SCAQMD Rule 1403 During Demolition/Renovation Activities

Besides estimating construction and operational air quality impacts, the Lead Agency should also describe compliance with SCAQMD Rule 1403 - Asbestos Emissions from Demolition/Renovation Activities due to the potential of discovering asbestos during the demolition activities described in the project description.

¹ <http://www.aqmd.gov/home/regulations/ceqa/air-quality-modeling>

² <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>

³ <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>

⁴ <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>

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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