



South Coast Air Quality Management District

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Department of City Planning
200 N. Spring Street, Room 750
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**Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) for the
Proposed Mixed-Use Development Located at 11628-11652 W. Pico Boulevard in
Los Angeles (ENV-2014-336-MND)**

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 the demolition of the existing two-story commercial structure and surface parking lot. The proposed project will include construction of a new mixed-use development with 71 residential dwelling units including approximately 2,686 square feet of commercial space on the ground floor. Finally, two levels of subterranean parking will be constructed for 94 parking spaces with approximately 13,000 cubic yards of soil being exported from the project site.

In the Air Quality Section, the lead agency has determined that project impacts are less than significant but did not quantify project air quality impacts. Because this information has not been included in the Draft MND, the lead agency has therefore 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.

To calculate the proposed project's emission impacts, the lead agency can utilize 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

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

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

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 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.

Finally, it is recommended that the lead agency evaluate localized air quality impacts since it is noted on page nine in the Draft MND and in an aerial map inspection, the proposed project is located within one-quarter mile of sensitive receptors (multi-family residential properties) south 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 website⁴.

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,



Edward A. Eckerle
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EE:GM

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

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