



South Coast Air Quality Management District

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**Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) for the
Proposed Four-Story 50-Unit Multi-Family Residential Building and a Two-Story
Commercial/Office Building Project Located at 7843 Lankershim Boulevard in Sun
Valley (MND-NG-15-143-PL; ENV-2014-4811)**

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 two existing buildings totaling 45,927 square feet followed by construction of two buildings making up a mixed-use development. A four-story, 66,656 square foot, 50-unit residential building would be built along with a two-story, 25,300 square foot commercial/office building. Although demolition is described, other construction assumptions used to estimate regional and localized air quality impacts during the different construction phases were not included in the project description. The project's estimated construction start and completion dates were also not included in the draft CEQA document.

On page eight in the Air Quality Section, the lead agency determined that project air quality impacts would be less than significant regionally and locally (affecting nearby residences) during construction activities but did not quantify project air quality impacts for either short- or long-term activities. 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 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

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

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 to be implemented if the air quality impacts are determined to be significant.

Although localized (as well as regional) air quality impacts are discussed in general in the Air Quality Section starting on page 14, potential impacts to nearby sensitive residential sensitive receptors were not actually calculated and compared to recognized significance thresholds in the Draft MND to demonstrate that impacts are less than significant. It is therefore 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) west and north, respectively, 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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JW:GM

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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>