



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

FAXED: AUGUST 5, 2005

August 5, 2005

Mr. Paul Davis
City of Los Angeles
Department of Recreation and Parks
1200 West 7th Street, Suite 700
Los Angeles, CA 90017

Dear Mr. Davis:

**Initial Study and Draft Mitigated Negative Declaration (IS/DMND) for Proposed
1644-48 Beverly Boulevard Pocket Park (July 2005)**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The SCAQMD also appreciates the additional time allowed by the lead agency for providing comments on the DMND for the proposed project. The following comments are meant as guidance for the Lead Agency and should be incorporated in the Final Mitigated Negative Declaration.

Please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Mitigated Negative Declaration. The SCAQMD would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Charles Blankson, Ph.D., Air Quality Specialist – CEQA Section, at (909) 396-3304 if you have any questions regarding these comments.

Sincerely

Steve Smith, Ph.D.
Program Supervisor, CEQA Section
Planning, Rule Development & Area Sources

Attachment

SS: CB
LaC050722-02
Control Number

Initial Study and Draft Mitigated Negative Declaration (IS/DMND) for Proposed 1644-48 Beverly Blvd. Pocket Park (July 2005)

Air Quality Emissions: The lead agency simply states on page 3-8 of the IS/DMND that the implementation of the proposed project would not violate any air quality standards, and that construction of the park would generate small amounts of short-term air emissions. The lead agency does not, however, provide any data to support this conclusion. Without quantifying air quality impacts from the proposed project, the lead agency has not demonstrated that the proposed project's air quality impacts are not significant. To calculate potential adverse air quality impacts from the proposed project, the SCAQMD recommends that the lead agency use either the emission calculation methodologies from the 1993 SCAQMD CEQA Air Quality Handbook or use the current version of the California Air Resources Board (CARB)-approved model URBEMIS 2002, which is available on the SCAQMD website at: www.aqmd.gov/ceqa/models.html. If quantification of emissions reveals that project emissions exceed the established significance thresholds, then mitigation measures must be required by the lead agency to reduce those emissions to less than significance.