



# South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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**Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND)  
for the Proposed Three-Story, Five-Unit Residential Condominium Project With  
Subterranean Parking Located at 10390 W. Ashton Avenue and 1234 S. Beverly  
Glen Boulevard in Westwood (MND-NG-13-140-PL/ENV-2012-2986)**

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 the existing three-unit apartment building and then build a five-unit, three-story condominium project that will include one level of subterranean parking. Soil disturbance, including the excavation of the subterranean garage, will involve approximately 4,000 cubic yards of soil export. The project's estimated construction start and completion dates were not included in the draft CEQA document.

In the Air Quality Section starting on page eight, the Lead Agency determined that project construction air quality impacts would be less than significant to nearby residences 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).<sup>1</sup> 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

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

SCAQMD's CEQA Air Quality Handbook.<sup>2</sup> 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 measures<sup>3</sup> to be implemented if the air quality impacts are determined to be significant.

Besides the general emission impacts based on the project description, the project specific emission estimates should also include haul truck emissions during demolition when carrying away debris to the respective disposal site(s) (the number of daily haul trucks, distance[s] to the haul site[s], etc.) and emissions from trucks carrying soil from the site to soil disposal area(s) (the number of daily haul trucks, distance[s] to the haul site[s], etc.). Further, the Final MND should include compliance with SCAQMD Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities associated with the demolition of the existing apartment building.

Finally, it is also 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 (multi-family residential properties) south 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.<sup>4</sup>

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

<sup>3</sup> <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>

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