



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 13-Unit Apartment Building With Subterranean Parking Project Located
at 124 S. Croft Avenue in the Wilshire Area in Los Angeles (MND-NG-15-160-PL;
ENV-2014-4660)**

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 eight existing residences totaling approximately 11,193 square feet followed by construction of a two-story, 4-Unit apartment building followed by construction of a five-story, 16,000 square foot 13-unit apartment building with one level of subterranean parking on a 0.172 acre site. The project will require soil export resulting from excavation of the garage and other soil disturbance. For the Final MND and future CEQA documents, sufficient information should be included to understand the assumptions used in the air quality analyses for regional and localized emission impacts. For example, the following should be included based on the project description: the estimated construction start and completion dates; the amount of debris demolition, the number of daily haul trips and approximately distance(s) to the disposal site(s) should be disclosed; the amount of soil export, the soil disposal destination site(s) distance(s), number of daily haul trips; a construction equipment list (e.g., numbers, types of construction equipment, hours of operation per day, etc.) should also be included in the Final CEQA document. These assumptions can be included in the narration, table(s), footnotes, as an appendix, or included with the modeling output sheets.

On page eight in the Air Quality Section, the lead agency determined that regional and localized project air quality impacts would be potentially significant without mitigation to nearby residences during construction activities but did not quantify project air quality impacts for short-term activities. Without quantifying project air quality impacts, the lead agency has not demonstrated that the proposed project will not generate significant

adverse construction 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 construction 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 Handbook.² Should the lead agency conclude after its analyses that construction or operational air quality impacts exceed the SCAQMD daily significance thresholds, SCAQMD staff has compiled mitigation measures³ if the air quality impacts are determined to be significant.

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 (residential properties) north, south and east of the proposed project. Therefore, the SCAQMD staff 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 staff 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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¹ <http://www.aqmd.gov/ceqa/models.html>

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>