



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • [www.aqmd.gov](http://www.aqmd.gov)

SENT VIA E-MAIL AND USPS:

April 14, 2015

[Peggy.Malone-Brown@lacity.org](mailto:Peggy.Malone-Brown@lacity.org)

[Darlene.Navarrete@lacity.org](mailto:Darlene.Navarrete@lacity.org)

Ms. Peggy Malone-Brown, City Planning Associate  
City of Los Angeles, City Hall  
Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

**Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) for the  
Proposed 5-Story, Mixed-Use Development Project Located on Two Properties  
Located at W. Weddington Street and Chandler Boulevard in N. Hollywood/Valley  
Village (ENV-2014-4604)**

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.

The Lead Agency proposes to demolish six existing commercial buildings, building foundations, and some surface parking lots in order to build on two sites that are separated by Blakeslee Avenue before construction and operation of a 5-story mixed use development that would include approximately 355,161 square feet of floor area, 329 apartment units, ground floor commercial/art-craft uses, and 591 parking spaces. Construction on the two sites would include: 1) Eastern Property - construction of a 329 apartment building with 4,316 square feet of ground-floor commercial uses, and relocation of and 1,966 square foot historical structure; 2) Western Property – construction of a 106 unit apartment building including 11 live/work units. Soil import/export of approximately 500 cubic yards is mentioned but the purpose is not clear. Basic information concerning the assumptions used to estimate the potential air quality impacts, e.g., the project start and completion dates, the amount of demolition debris, number of haul vehicles (demolition debris/soil import/export), soil disposal sites/soil source sites, demolition debris disposal site locations/distances, on-and off-road equipment lists, etc., were not included in the Draft IS/MND.

In the Air Quality Section starting on page 12, the lead agency determined that project air quality impacts would not be potentially significant for regional or localized impacts 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 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 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.

It is also recommended that the lead agency evaluate localized air quality impacts since it is noted on page seven 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 and East Valley High School) to the north, east 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 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*

Jillian Wong, Ph.D.  
Program Supervisor  
Planning, Rule Development & Area Sources

JW:GM

LAC150402-01  
Control Number

---

<sup>1</sup> <http://www.aqmd.gov/home/regulations/ceqa/air-quality-modeling>

<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>