



South Coast Air Quality Management District

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Draft Initial Study/Mitigated Negative Declaration (DMND) for the Proposed 59,657 Square Foot Mixed-Use Development Project Including a 70-Unit of Multi-Family Residential Building With 5,289 Square Feet of Commercial Retail Space Located at 2800 W. Olympic Boulevard in Wilshire (ENV-2014-1954)

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 proposed project site covers five lots and is approximately 0.57 acres in size. The Lead Agency proposes to demolish existing structures that total 8,637 square feet before constructing an approximately 59,657 square foot mixed-use building. The five-story building will have 70 multi-family residential units and include 5,289 square feet of commercial/retail space on the ground floor. Two-levels of subterranean parking are planned with spaces for 133 vehicles and 81 bicycles. Grading will include less than 500 cubic yards of soil that will be balanced on-site.

Project Description/Air Quality Section

The DMND does not include the basic information needed to understand the scope of the project's potential peak daily air quality impacts. This information should be supplied in the project description or the air quality section in the Final MND, as applicable. For example, the project start date, periods of each construction phase (including any overlapping phases), the project completion date, etc., should be included in the Final MND. An equipment list for each phase of construction should be included describing the numbers, types of equipment and hours of operation for each item. Demolition information should include the amount of debris removed, number of haul trucks, distance(s) to disposal sites, etc. Excavation information to dig the subterranean garage should include the amount of soil removed, number of haul trucks, distances to disposal sites, etc. These assumptions should be the basis of the air quality analysis used to estimate project emissions in the Final MND.

Regional and Localized Air Quality Analyses

Project regional and localized air quality impacts for construction and operations should be analyzed in the Final MND. Starting on page 25 in the air quality section, the Lead Agency determined that project construction and operational air quality impacts were less than significant by relying on the screening tables in Chapter 6 of the SCAQMD's 1993 CEQA Air Quality Handbook but did not quantify the proposed project's air quality impacts. Since these tables do not account for soil disturbance activities including excavation or localized impacts to surrounding sensitive receptors and use now outdated mobile source emission factors, relying solely on these tables does not demonstrate that short- and long-term air quality impacts are below significance threshold levels. Rather, the SCAQMD staff recommends that project impacts be quantified and compared with recognized significance thresholds in the Final MND in order to demonstrate the lead agency's determination that project impacts are less than significant.

For estimating regional and localized project impacts, the current California Emission Estimator Model (CalEEMod)¹ land use emissions model is available that can quantify potential project criteria pollutant and also greenhouse (GHG) emissions. Project emissions can also be estimated 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 in addition to the mitigation included in the DMND starting on page two of the DMND to be implemented if the air quality impacts are determined to be significant.

Localized air quality impacts should also be evaluated since sensitive receptors (multifamily residences and children's indoor gymnasium) are located within a quarter mile of the project site, south, north and west of the project site and would potentially be adversely impacted by the construction and excavation activities occurring at the site. SCAQMD guidance for performing a localized air quality analysis can also be found at the SCAQMD website.⁴

Potential Odors/Health Impacts

In addition, the Final MND should discuss Rule 402 – Nuisance from potential odors that could potentially come from the auto-body shop located east of the project site. Finally, the Final MND should discuss potential health risks to the proposed residents from the existing auto body shop since toxic air contaminants may be emitted from the on-going auto body shop operations.

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

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

³ http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html

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

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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,

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JB:GM

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