



# 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 3-4 Story, 84-Unit Multi-Family Residential Building Project Located at  
707 N. Cole Avenue in Hollywood (ENV-2014-2486)**

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 nine existing residential structures and approximately 23 trees on a multiple-lot site that is approximately one acre in size. After demolition is completed, construction will begin for an approximately 103,495 square foot, three to four story, 84-unit, multi-residential building with a subterranean garage for approximately 161 vehicles, 101 bicycles and spaces for eight electric charging stations. The DMND did not include basic information to understand the scope of the project's potential air quality impacts. This information should be supplied in the Final MND. The Final MND should state the project start dates, periods of each construction phase, including any overlapping phases, an equipment list for each phase, and when the project will be completed. Demolition information should be supplied including the amount of debris removed, number of haul trucks, distance(s) to disposal sites, etc. Excavation information to dig the subterranean garage, grading or other soil disturbance should also be added, e.g., number of levels of below-grade parking, the amount of soil removed, number of haul trucks, distances to disposal sites, etc. should be described and analyzed in the Final MND.

The Final MND should analyze project regional and localized air quality impacts for construction and operations. In the air quality section on page 22, 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soil disturbance activities including excavation or localized impacts to surrounding sensitive receptors and use now outdated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)<sup>1</sup> 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.<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> in addition to the mitigation included in the Draft MND starting on page two of the Draft MND 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 residential condominiums) 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.<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 Baker*

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JB:GM

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

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

<sup>3</sup> [http://www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html)

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