



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 4-Story, 72-Unit Mixed-Use Apartment/Commercial Use Building Project
Located at 1947 S. Sawtelle Boulevard in West Los Angeles (ENV-2014-2868)**

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.

Project Description

The Lead Agency proposes to demolish the existing 39,129 square foot 2-story commercial building before building a new 64,566 square foot, 72-unit apartment building that would include 7,700 square feet of ground floor commercial space and a two-level subterranean garage on an approximately 0.90-acre site. The excavation of the subterranean garage will result in the export of approximately 18,000 cubic yards of soil. The project start and completion dates were not included in the Draft IS/MND.

Under environmental settings on page three, there is a question about the further development described on the western portion of the site and whether the development of two-story duplex residential buildings is part of the proposed project. This discrepancy should be clarified in the Final MND. In addition, if the duplex buildings are part of the proposed project, the project description and each air quality analysis should be revised in the Final CEQA document to include the potential air quality impacts from this development.

Need to Demonstrate the Lead Agency's Determination Findings

Regional Air Quality Impacts

In the Air Quality Section starting on page eight, 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 staff 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).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, staff has compiled mitigation measures³ to be implemented if the air quality impacts are determined to be significant.

Localized Air Quality Impacts

It is also recommended that the lead agency evaluate localized air quality impacts since it is noted on page four 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) 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

CARB Guidance for Siting Sensitive Receptors Near Freeways

In the Draft MND, the proposed residences will be sited near the Interstate Highway 405 (I-405). Based on an aerial map inspection, these residences would be approximately 475 feet west of the freeway, of which I-405 has an average daily traffic volume of 313,000 vehicles⁵, which includes diesel trucks. Because of the close proximity to the existing freeway, residents would be exposed to diesel particulate matter, which is a toxic air contaminant.

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

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>

⁵ California Department of Transportation – Traffic Counts

Accessed at: <http://traffic-counts.dot.ca.gov/2013all/Route280-405.html> at Los Angeles/Olympic Blvd, 313,000 Average Daily Vehicle Traffic.

Numerous health studies have demonstrated the potential adverse health effects of living near highly travelled roadways. As a result of these studies, the California Air Resources Board (CARB) recommended in 2005 avoiding the siting of housing within 500 feet of a freeway in their Land Use Handbook.⁶ Since the time of that study, additional research has continued to build the case that the near roadway environment also contains elevated levels of many pollutants that adversely affect human health, including some pollutants that are unregulated (e.g., ultrafine particles) and whose potential health effects are still emerging.⁷

The SCAQMD staff therefore recommends that the site plan be evaluated to ensure that residents are outside of the recommended 500 foot buffer, i.e., placing non-sensitive receptor uses between the future residents and the freeway, such as entrance/exit driveways, parking spaces, landscaping, etc., or disclose the potential health risks to future residents in the Final CEQA document by preparing a Health Risk Assessment (HRA).

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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⁶ California Air Resources Board. April 2005. "Air Quality and Land Use Handbook: A Community Health Perspective."

Accessed at: <http://www.arb.ca.gov/ch/landuse.htm>

⁷ See Chapter 9 of the 2012 AQMP for further information

Accessed at: [http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2012-air-quality-management-plan/final-2012-aqmp-\(february-2013\)/chapter-9-final-2012.pdf](http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2012-air-quality-management-plan/final-2012-aqmp-(february-2013)/chapter-9-final-2012.pdf).