



South Coast Air Quality Management District

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**Draft Mitigated Negative Declaration (DMND) for the Proposed
80-Unit, Six-Story Residential Building Located at 1230 W. Ingraham Street in Westlake
(ENV-2015-1302-MND)**

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 includes construction of an 80-unit, 67,115 square foot, six-story multi-residential building that will include three levels of parking with two levels below grade on an approximately one-half acre sized lot. The proposed project will also require approximately 20,000 cubic yards of soil export based on soil disturbance and excavation needs. Currently, the site is developed as a surface parking lot and the surrounding land uses include multi-family residences.

In the Air Quality Section starting on page 19, the Lead Agency refers to construction and operational emissions estimates¹. The DMND includes the SCAQMD regional operational thresholds but does not include the construction thresholds. The DMND further includes the Lead Agency's determination that construction emission impacts are less than significant with mitigation but did not include the actual unmitigated and mitigated estimates in the DMND. Operational impacts were also discussed and the SCAQMD operational thresholds were included in the narrative but the actual estimates were not included in the DMND. The SCAQMD staff therefore recommends that the Lead Agency update the Air Quality Analysis to substantiate the significance findings in the DMND by including, at a minimum, summary information of the emission estimates in the Final MND. The summary information should include the unmitigated and mitigated regional estimates compared with the applicable thresholds of significance. Further, the estimated project construction start and completion dates along with the phasing schedule should also be included. This supporting information can be included in the narration, in tables or as part of an appendix. Otherwise, the Lead Agency has not included the substantial evidence needed to support its findings.

¹ DMND, Page 20, Section III (b), CalEEMod Tables 2.1 (Construction) and Table 2.2 (Operations).

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The SCAQMD staff is also concerned that localized air quality impacts were not analyzed in the DMND since sensitive receptors are located within one-quarter mile of the project site (multi-family residents). The SCAQMD staff therefore recommends that the Lead Agency include an assessment of potential localized air quality impacts. These potential air quality impacts should be assessed using SCAQMD's Localized Significance Methodology and compared to the localized significance thresholds specific to the project area². In the event that the Lead Agency determines the proposed project will result in significant localized construction air quality impacts, the SCAQMD staff recommends that the Lead Agency require mitigation to minimize these impacts. Additional construction-related air quality mitigation measures are available at the SCAQMD website in addition to the measures included in the DMND starting on page two of the DMND.³

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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² The Localized Significance Threshold (LST) methodology and Mass Rate LST Look Up Table is available at: <http://www.aqmd.gov/ceqa/handbook/LST/LST.html> .

³ Mitigation Measures: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>