



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Review of the Mitigated Negative Declaration (MND) for the Proposed Residential Building Project Located at 21504 W. Saticoy St and Canoga Park-Winnetka-Woodland Hills-West Hills Area of the City of Los Angeles (ENV-2015-2866)

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.

According to the project description, the Lead Agency proposes the construction, use, and maintenance of a new residential building. This residential development is a 3-story, 44'-9" high apartment building containing 29 residential dwelling units, comprised of approximately 41,271 square foot (sq ft) of floor area on a 21,832 sq ft site. The proposed building will provide a total of 56 automobile parking spaces and the construction of the project will involve site grading and export of approximately 587 cubic yards of dirt to accommodate the parking. The project site is currently improved with two residential dwelling units which will be demolished as part of the project development.

In the Draft MND, the Lead Agency failed to quantify the project's air quality emissions during both construction and operation. The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The SCAQMD staff recommends that the lead agency use this Handbook as guidance to prepare an air quality analysis in the Final MND. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720. More recent guidance developed since this Handbook was published is also available on SCAQMD's website here: www.aqmd.gov/ceqa/hdbk.html. SCAQMD staff also recommends that the lead agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: www.caleemod.com.

The proposed project is also adjacent to sensitive land uses¹ (i.e., residential dwellings to the north, south, east, and west); however, the Draft MND did not evaluate potential localized air quality impacts that could result from construction of the proposed project. Therefore, the SCAQMD staff

¹ 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>

recommends that the lead agency revise the air quality analysis to include an assessment of potential localized air quality impacts during demolition and construction of the proposed project. 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. Furthermore, the lead agency should ensure that all future projects include a localized air quality analysis if warranted. 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 to a less than significant level. Additional construction-related air quality mitigation measures are available at:
http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html

Pursuant to Public Resources Code Section 21092.5, SCAQMD staff requests that the Lead Agency provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the final CEQA document. Further, staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Sam Wang, Air Quality Specialist – CEQA Section, at (909) 396-2649, if you have any questions regarding these comments.

Sincerely,

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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>