



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Draft Mitigated Negative Declaration (Draft MND) for the Proposed 47,300 Square Foot Mixed-Use Project Located at 3331 N. Broadway in the Northeast Portion of the City of Los Angeles (ENV-2012-1881)

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

In the project description, the Lead Agency proposes the development of a three-story mixed use office and retail building with an adjacent four-story parking structure on an approximately 1.12-acre site. Demolition activities include removal of the existing retaining walls and concrete pavement on the site. The proposed project will also require the export of approximately 18,000 cubic yards of demolition debris. Details including the amount of export haul trips, vehicle miles traveled to the demolition debris disposal site(s) were not included in the Draft MND. The approximate project start date, phasing and project completion date were also not included in the Draft MND.

Air Quality Analyses

The Lead Agency has determined that project air quality impacts would result in less than significant impacts during construction and operation activities but did not quantify short- or long-term air quality emissions. Without quantifying project air quality impacts, the Lead Agency has not demonstrated that the proposed project will not generate significant adverse construction or operational air quality impacts that may trigger further analysis and additional mitigation 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 Handbook².

It is noted in an aerial map inspection and in the environmental settings section on page three that the proposed project is located within one-quarter mile of sensitive receptors (single- and multi-family residences, a child care center, an elementary school and a high school) north, south and east of the project site. Therefore, the SCAQMD staff recommends 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 website³. Should the Lead Agency conclude after its analyses that construction or operational air quality impacts exceed the SCAQMD daily significance thresholds, SCAQMD staff has compiled mitigation measures⁴ to be implemented, in addition to the measures listed starting on page two in the Draft MND, if the air quality impacts are determined to be significant.

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 Wong

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

² <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>

³ <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>

⁴ <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>