



# South Coast Air Quality Management District

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Department of City Planning  
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**Draft Mitigated Negative Declaration (Draft MND) for the Proposed 14-Unit Residential Project Located at 11027-11037 ½ W. Morrison Street in the North Hollywood Area of the City of Los Angeles (ENV-2015-4655)**

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 to demolish three single-family residences and construct 14 residential units on 14 separate lots on an approximately 0.38-acre lot. Details including the amount of demolition debris, haul trips, vehicle miles traveled to the waste disposal site(s) were not described 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 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)<sup>1</sup>. 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

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

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>.

It is also recommended that the Lead Agency evaluate localized air quality impacts since 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 (multi-family residences) north, east and south 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 website<sup>3</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>4</sup> to be implemented if the air quality impacts are determined to be significant.

#### Compliance With SCAQMD Rule 1403 During Demolition/Renovation Activities

Besides estimating construction and operational air quality impacts, the Lead Agency should also describe compliance with SCAQMD Rule 1403 - Asbestos Emissions from Demolition/Renovation Activities due to the potential of discovering asbestos during the demolition activities described in the project description.

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

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

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