



# South Coast Air Quality Management District

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## **Draft Mitigated Negative Declaration (Draft MND) for the Proposed Eldercare Facility in Sun Valley (ENV-2011-2576-MND)**

The SCAQMD staff was informed by a local resident that the lead agency had released a Draft MND for the proposed project with the public comment period ending October 17, 2012. Although the State Clearinghouse CEQA Database shows receipt of the Draft MND, the SCAQMD staff did not receive the Draft MND during the public comment period and was therefore not provided the opportunity to review the document or make comments. Please update the CEQA document distribution list by adding the SCAQMD's address and contact information to ensure that the SCAQMD staff receives all future CEQA documents available for public review. If the Final MND for this project has not been certified, the SCAQMD staff would appreciate the opportunity to still comment on the above-named document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final CEQA document.

In the project description, the lead agency proposes the construction of 71,210 square feet of building space for a four-story, 96-unit, Eldercare Facility that would include 56 parking spaces. The approximate 1.5 acre irregular shaped lot partially abuts the Interstate-5 Freeway (I-5 Freeway) south of the project site. Other surrounding land uses include a mobile home park to the west, apartments to the north and office-commercial uses to the east. The AQMD staff is concerned that the proposed sensitive land use site is located in a traditionally incompatible setting with the existing freeway adjacent to the project site. Based on guidance from the California Air Resources Board (CARB) Air Quality and Land Use Handbook,<sup>1</sup> it is recommended to avoid siting new sensitive land uses within 500 feet of a freeway to avoid exposing vulnerable populations (such as the elderly) to substantial pollutant concentrations. Contrary to this recommendation and without further analysis, the Draft MND states that the proposed project would not significantly expose sensitive receptors to substantial pollutant concentrations. Because of the potential exposure to vehicle emissions including diesel particulate matter from

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<sup>1</sup> (CARB) Air Quality and Land Use Handbook:  
[http://www.aqmd.gov/ceqa/handbook/other\\_useful\\_links/ARBhandbook.pdf](http://www.aqmd.gov/ceqa/handbook/other_useful_links/ARBhandbook.pdf) .

trucks and other vehicles, the SCAQMD staff recommends further analysis by conducting a Health Risk Assessment to determine the potential health effect impacts from those emissions to the prospective occupants and staff working at the proposed Eldercare Facility prior to determining the significance of this impact. As mitigation, the lead agency proposes an air filtration system be installed and maintained meeting or exceeding the ASHRAE Standard 52.2 Minimum Efficiency Reporting Value (MERV) of 13. Though this mitigation would likely have some effectiveness, this mitigation has its limits and does not protect the occupants or staff who are outside on the facility grounds. The proposed mitigation also does not discuss how effective it will be after considering factors such as: long-term maintenance and replacement of filters, opening of windows and doors, and the sealing of the building to avoid air bypassing the filtration system. Because of the proximity of the I-5 Freeway next to the proposed site, the SCAQMD staff requests that these potential incompatible land use concerns related to air quality be addressed prior to adopting the project. It is therefore unclear to the SCAQMD staff without the technical analysis how the proposed mitigation as described in the Draft MND will adequately address the potentially significant health effect impacts.

In addition, the lead agency has determined that project construction and operational air quality impacts would be less than significant with mitigation but does not quantify the project's emissions or compare those impacts with the SCAQMD's recommended regional daily significance thresholds. Because this information has not been included in the Draft MND, the lead agency has therefore 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. To calculate the proposed project's emission impacts, the lead agency can utilize the current California Emission Estimator Model (CalEEMod).<sup>2</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 follow the calculation methodologies in the SCAQMD's CEQA Air Quality Handbook. Should the lead agency conclude after its analyses that construction or operational air quality impacts exceed the SCAQMD's daily significance thresholds, staff has compiled mitigation measures that can be implemented.<sup>3</sup>

Finally, in addition to evaluating the above-mentioned regional air quality impacts, the SCAQMD staff recommends that the lead agency estimate localized air quality impacts to ensure that any nearby sensitive receptors are not adversely affected by the construction or operations activities that are occurring in close proximity. It is noted on page nine of the Draft MND under surrounding land uses and in an aerial map inspection that the proposed project is located within one-quarter mile of sensitive receptors (residential property) north and west of the proposed project. SCAQMD guidance for performing a localized air quality analysis can be found on the SCAQMD web page below.<sup>4</sup>

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<sup>2</sup> CalEEMod is accessible at: <http://www.caleemod.com> .

<sup>3</sup> Mitigation measure suggestions can be found at: [http://www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html) .

<sup>4</sup> SCAQMD guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/ceqa/handbook/LST/LST.html> .

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3

February 20, 2013

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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