



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Ms. Jennifer Karmels
City of Los Angeles, City Hall
Department of City Planning
200 N. Spring Street, Room 750
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**Draft Mitigated Negative Declaration (Draft MND) for the Proposed Residential Dwelling Located at
459 S. Hartford Ave.; Westlake (ENV-2013-3680)**

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 MND.

In the project description, the Lead Agency proposes to construct a 7-story 94-unit residential housing complex. The Draft MND does not indicate if any grading will be required to provide for the anticipated 105 parking spaces. Due to the lack of information, SCAQMD staff recommends that the Lead Agency prepare an air quality analysis to disclose the air quality impacts from the construction and operation of the project.

The proposed project is also adjacent to sensitive land uses¹ (i.e., residential dwellings north, south, east, and west of the project site); 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 recommends that the Lead Agency include an assessment of potential localized air quality impacts during 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

The SCAQMD staff is available to work with the Lead Agency to address these concerns and any other air quality questions that may arise. Please contact Jack Cheng, Air Quality Specialist at (909) 396-2448, if you have any questions regarding these comments. We look forward to reviewing and providing comments for the Final MND associated with this project.

Sincerely,

Jillian Wong

Jillian Wong, Ph.D.
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JW:JC
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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>

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>