



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL AND USPS:

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Nicole.Sanchez@lacity.org

Darlene.Navarrete@lacity.org

Ms. Nicole Sanchez, Planning Assistant
City of Los Angeles, City Hall
Department of City Planning
200 N. Spring Street, Room 721
Los Angeles, CA 90012

**Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) for the
Proposed Construction of a Four-Story Multi-Family Building Project Located at
846 N. Wilcox Avenue in Hollywood (ENV-2014-4806-MND)**

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.

In the project description, the Lead Agency proposes demolition of five existing single-family residence structures totaling approximately 2,819 square feet. Then, construction will begin on an approximately 28,986 square foot, five-story, 23-unit, multi-family residential building with a one-level below grade parking structure on a total lot size of approximately 13,600 square feet (0.31 acre). The amount of soil exported from excavation and other soil disturbance is not included in the Draft IS/MND. The project construction start and completion dates are also not included in the Draft IS/MND.

The SCAQMD staff is concerned that the Lead Agency determined that project air quality impacts were less than significant without quantifying these potentially adverse impacts in the Draft IS/MND. In the Air Quality Section, the Lead Agency based its determination by using the screening tables in Chapter 6 of the SCAQMD's 1993 CEQA Air Quality Handbook (SCAQMD Handbook). The SCAQMD staff has not supported the use of the SCAQMD Handbook screening tables for a number of years because those screening tables are now outdated. In addition, the tables do not account for activities like excavation or for localized impacts. As a result of relying solely on the screening tables, instead of quantifying air quality impacts, the Lead Agency has failed to demonstrate 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 recognized resources

such as 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 Handbook.² 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 measures³ to be implemented if the air quality impacts are determined to be significant.

Besides the general emission impacts based on the project description, the project specific emission estimates should also include haul truck and associated emissions during demolition and soil export from trucks carrying debris and excavated soil from the project site to a disposal area(s). Basic assumptions used to estimate those emissions, e.g., the number and types of daily haul trucks, distance(s) to the haul site(s), etc., should also be included. Further, the Lead Agency should describe compliance with SCAQMD rules and regulations including, but not limited to, Rule 1403 - Asbestos Emissions from Demolition/Renovation Activities and Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil should the demolition include materials that contain asbestos (Rule 1403) or Volatile Organic Compounds (VOC) are encountered during excavation (Rule 1166).

It is also recommended that the Lead Agency evaluate localized air quality impacts since it is noted on page three under environmental settings and in an aerial map inspection, the proposed project is located within one-quarter mile of sensitive receptors (residential properties) surrounding the proposed project. Therefore, the SCAQMD staff requests 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.⁴

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.

¹ <http://www.aqmd.gov/ceqa/models.html>

² <http://www.aqmd.gov/ceqa/hdbk.html>

³ <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>

⁴ <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>

Ms. Nicole Sanchez,
Planning Assistant

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Sincerely,

Jillian Baker

Jillian Baker, Ph.D.
Program Supervisor
Planning, Rule Development & Area Sources

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