



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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September 14, 2017

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Negative Declaration (ND) for the Proposed 13724-13732 W Victory Blvd; Van Nuys-North Sherman Oaks (ENV-2016-2613)

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comment is meant as guidance for the Lead Agency and should be incorporated into the Final ND.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to demolish four buildings totaling 3,352 square feet and construct a 61,245-square-foot mixed use building consisting 67 residential units and 2,100 square feet of commercial space on 0.58 acres (Proposed Project).

Air Quality Analysis

Based on a review of the air quality analysis in the ND, SCAQMD staff found that the Lead Agency did not quantify the Proposed Project's construction or operational emissions. One of the basic purposes of CEQA is to inform government decision makers and the public about the potential significant environmental effects of proposed activities (CEQA Guidelines Section 15002(a)(1)). A negative declaration is appropriate when the Lead Agency finds that a project will not have a significant effect on the environment (CEQA Guidelines Sections 15070 to 15075). Reasons to support this finding shall be documented in the initial study. Without quantifying the Proposed Project's emissions, the ND for the Proposed Project has not made that documentation which serves as substantial evidence to support a fair argument that the Proposed Project would not have any adverse effects on air quality. Therefore, SCAQMD staff recommends that the Lead Agency calculate construction and operational emissions and compare those emissions to SCAQMD's air quality CEQA significance thresholds¹ in the Final ND.

The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. SCAQMD staff recommends that the Lead Agency use this Handbook as guidance to prepare the air quality analysis in the Final ND. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720. More recent guidance developed since this Handbook was published is also available on SCAQMD's website here: www.aqmd.gov/ceqa/hdbk.html. SCAQMD staff also recommends that the Lead Agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and is available free of charge at: www.caleemod.com.

¹ South Coast Air Quality Management District. *SCAQMD Air Quality Significance Thresholds*. Available at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>.

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Pursuant to the CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the ND for adoption together with any comments received during the public review process. SCAQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Jack Cheng, Air Quality Specialist, CEQA IGR Section, at (909) 396-2448, if you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS:JC

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