



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Draft Mitigated Negative Declaration (Draft MND) for the Proposed Five-Story, 80-Unit Apartment Building Project Located at 438 S. Lake Street in the Westlake Area of Los Angeles (ENV-2015-712-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 to construct a five-story, 80-unit multi-family residential building with two levels of subterranean parking that will include 154 parking spaces on an approximately 0.75-acre site. Soil disturbance from grading/excavation, etc., will include approximately 11,101 cubic yards of soil export. Based on the review of the Draft MND, the start of the construction period, phasing, any overlapping phases, completion dates, and an analysis of the peak daily emissions are not included in the Draft MND. SCAQMD staff recommends clarifying the Draft MND providing additional details in the project description and air quality analysis to assist the public in understanding the Lead Agency's assumptions used to reach its significance determinations.

The Lead Agency has determined that project air quality impacts are less than significant citing the "City of Los Angeles CEQA Thresholds Guide Exhibit B.2-1"¹ that was not included with the Draft MND. For the Final MND and future CEQA documents, documentation that supports the Lead Agency's determination that project air quality impacts are less than significant should be included to allow the general public, other commenting agencies, and other interested parties to review the information used to demonstrate the Lead Agency's findings. Without this documentation, the public and other interested parties cannot adequately review the basis of the Lead Agency's findings.

All applicable air quality impacts, including impacts from construction and operation activities, should be quantified and included in the Final MND. These impacts should then be compared with recognized significance thresholds for both regional and localized impacts.

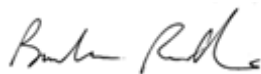
¹ Draft MND, Page 19.

The SCAQMD staff further recommends that the Lead Agency provide sufficient documentation or demonstrate that project impacts are less than significant in the Final MND by estimating short- and long-term air quality impacts. These impacts can be calculated using the current California Emission Estimator Model (CalEEMod)². 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's CEQA Air Quality Handbook³.

Finally, it is recommended that the Lead Agency evaluate localized air quality impacts since it is noted on page four in the Draft MND and in an aerial map inspection that the proposed project is located within one-quarter mile of sensitive receptors (multi-family residences) to the north, south and east of the proposed project. Therefore, 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 on the SCAQMD's website⁴. 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 measures⁵ to be implemented if the air quality impacts are determined to be significant.

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,



Barbara Radlein
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BR:GM

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

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

⁴ <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>

⁵ <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>