



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 Three, 4-Story Residential Buildings Project Located at 1010 E. Jefferson Boulevard in the Southeast Los Angeles Area of the City of Los Angeles (ENV-2015-4495)

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.

Project Description

In the project description, the Lead Agency proposes to demolish the existing church buildings as part of the proposed project.¹ The Lead Agency then proposes modification and reuse of an existing two-story former funeral home building by adding four new stories becoming a new residential use. In addition, three new four-story residential buildings will be constructed. A subterranean parking garage will be excavated and built to accommodate 42 vehicles and 41 bicycles. The four residential buildings will occupy approximately 41,660 square feet of floor area on the approximately 0.69-acre lot. Site preparation will include approximately 50,000 cubic yards of soil export² related to the excavation of the subterranean garage and other soil disturbance activities. The approximate project start date, phasing and project completion date were not included in the Draft MND.

Air Quality Analyses

The Lead Agency has determined that project air quality impacts would result in less than significant impacts during construction and operation activities but did not quantify short- or long-term air quality emissions. Without quantifying project air quality impacts, the Lead Agency has 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. 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 the current California Emission

¹ Draft MND, Page 28, Section VIII (b).

² Public Notice Dated Thursday, March 24, 2016 stated before the end of the review/public comment period.

Estimator Model (CalEEMod)³. 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 Handbook⁴.

It is noted in an aerial map inspection and in the environmental settings section on page three that the proposed project is located within one-quarter mile of sensitive receptors (a charter elementary school and residential properties) north, south and east of the project site. 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 website⁵. 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 measures⁶ to be implemented if the air quality impacts are determined to be significant.

Compliance With SCAQMD Rule 1403

Besides estimating construction and operational air quality impacts, the Lead Agency should also describe compliance with SCAQMD Rule 1403 - Asbestos Emissions from Demolition/Renovation Activities due to the potential of discovering asbestos during the demolition of the existing church and renovation activities described in the Draft MND.⁷

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,

Jillian Wong

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

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

⁵ <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>

⁶ <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>

⁷ Draft MND, Page 28, Section VIII (b).