



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Draft Mitigated Negative Declaration (MND) for the Proposed Six-Story, Mixed-Use Development Located at 7131 N. Sepulveda Boulevard in the Van Nuys-North Sherman Oaks Area of the City of Los Angeles (ENV-2015-3906)

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

The Lead Agency proposes to develop mixed use residential building with commercial uses including 180 residential dwelling units and 4,750 square feet of commercial floor space. The six-story building will be approximately 197,000 square feet in size and will include two levels of subterranean parking and at grade parking for the commercial uses. The project will require approximately 40,250 cubic yards of soil export from soil disturbance activities including the excavation of the parking garage. The project site contains a vacant single-story building and an associated surface parking lot.¹ The air quality assumption details including the amount of demolition debris for the unoccupied building and surface parking lot materials and soil export haul trips, vehicle miles traveled to the demolition debris and soil disposal site(s) are not included in the Draft MND. The approximate project start date, phasing and project completion date are also 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 operational 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 and additional mitigation 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

¹ DMND, Page Five and an Aerial Map Inspection.

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.

In addition to estimating project regional emission impacts, 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 (multi-family residential buildings), west of the project site. Therefore, the SCAQMD staff recommends 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 website⁴. Should the Lead Agency conclude after its analyses that construction or operational air quality impacts exceed the SCAQMD daily significance thresholds, SCAQMD staff has compiled mitigation measures⁵ to be implemented in order to reduce those impacts below significant levels.

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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JW: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>