



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:
Naomi.Guth@lacity.org

August 14, 2014

Ms. Naomi Guth, City Planner
City of Los Angeles, City Hall
Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012

**Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) for the
Proposed General Office Building With Subterranean Parking Project
Located at 900 S. Gayley Avenue/10966-10974 W. Le Conte Avenue in Westwood
(MND-NG-14-265-PL/ENV-2014-198)**

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 demolish an existing 10,714 square foot two-story commercial building followed by construction of a four-story, 38,539 square foot general office and retail use building. In addition, a three-level subterranean parking structure with 117 spaces and 132 bicycle racks would be built. 34 off-site parking spaces are also included in the project description but whether any construction activities will occur related to the off-site parking is not discussed. During site excavation, approximately 17,127 cubic yards of soil would be exported off-site. The project's estimated construction start and completion dates were not included in the draft CEQA document.

In the Air Quality Section starting on page 19, the lead agency determined that project air quality impacts would not be potentially significant to nearby residences during construction activities but did not quantify project air quality impacts for either short- or long-term activities. 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 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 Estimator Model (CalEEMod).¹ CalEEMod is a statewide land use emissions model that can quantify potential project criteria pollutant and greenhouse (GHG)

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

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 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 in addition to the mitigation included in the Draft MND starting on page two of the Draft MND to be implemented if the air quality impacts are determined to be significant.

It is also recommended that the lead agency evaluate localized air quality impacts since it is noted on page seven of the Draft IS/MND and in an aerial map inspection, the proposed project is located within one-quarter mile of sensitive receptors (multi-family residential properties) west of the proposed project. Therefore, the SCAQMD 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.

Sincerely,



Edward A. Eckerle
Program Supervisor
Planning, Rule Development & Area Sources

EE:GM

LAC140807-05
Control Number

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

³ http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html

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