



# South Coast Air Quality Management District

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**Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) for the  
Proposed Multi-Residential Apartment Building With Subterranean Parking  
Project Located at 5651 N. Farmdale Avenue in North Hollywood  
(MND-NG-14-277-PL/ENV-2014-323)**

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 three existing residential structures and construct a new, three-story, 44-unit 26,250 square foot residential apartment building with 76-parking spaces in a subterranean parking structure. Soil disturbance and other construction information were not included in the Draft MND, e.g., the amount of demolition debris, the amount of area graded, the amount of excavation for the subterranean garage, debris and soil export hauling information, phasing schedules, overlapping phase information as applicable, the project start and completion dates, etc. These assumptions should be included in the Final MND and future CEQA documents consistent with any air quality analysis performed to determine if project air quality impacts are less than significant.

In the air quality section on page 16, the lead agency determined that project construction and operational air quality impacts were less than significant by relying, in part, on the screening tables in Chapter 6 of the SCAQMD's 1993 CEQA Air Quality Handbook but did not quantify the proposed project's air quality impacts. Since these tables do not account for soil disturbance activities including excavation or localized impacts to surrounding sensitive receptors and use now outdated mobile source emission factors, relying solely on these tables does not demonstrate that short- and long-term air quality impacts are below significance threshold levels. Rather, the SCAQMD staff recommends that project impacts be quantified and compared with recognized significance thresholds in the Final MND in order to demonstrate the lead agency's determination that project impacts are less than significant.

For estimating regional and localized project impacts, the current California Emission Estimator Model (CalEEMod)<sup>1</sup> is available. CalEEMod is a statewide land use emissions model that can quantify potential project criteria pollutant and also 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 Handbook.<sup>2</sup> 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 measures<sup>3</sup> 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 four of the Draft IS/MND and in an aerial map inspection, the proposed project is located within one-quarter mile of sensitive receptors (multi- and single-family residential properties) surrounding 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.<sup>4</sup>

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  
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EE:GM

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

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

<sup>3</sup> [http://www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html)

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