



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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**Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) for the
Proposed 16-Single Family Dwelling Project Located at 11580-11594 W. Riverside
Drive and 4748-4752 N. Irvine Avenue in North Hollywood/Valley Village
(ENV-2014-2444)**

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.

Project Description

In the project description, the lead agency proposes to demolish 3-four unit buildings, three detached garages and removal of 17 trees. Construction of 16 single-family-residences would then begin on an approximately 20,792 square foot site currently divided into three separate lots. 36 total at-grade parking spaces will be provided along with a 20 foot provide drive accessed off of Irvine Avenue. The project start and opening year dates were not included in the Draft MND.

Air Quality Analyses

The Lead Agency has determined that project air quality impacts would be potentially significant without mitigation during construction and operations 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

¹ <http://www.aqmd.gov/home/regulations/ceqa/air-quality-modeling>

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 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 recommended that the Lead Agency evaluate localized air quality impacts since it is noted in an aerial map inspection and alluded to in the environmental settings section on page five that the proposed project is located within one-quarter mile of sensitive receptors (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.⁴

Compliance With SCAQMD Rules and Permit Requirements

Besides estimating construction and operational air quality impacts, the Lead Agency should describe compliance with SCAQMD rules and regulations in the Final MND including, but not limited to, Rule 402 – Nuisance; Rule 403 – Fugitive Dust; and Rule 1403 - Asbestos Emissions from Demolition/Renovation Activities.

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 Baker

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

³ <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>

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