



# 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 50-Unit Mixed-Use Building Project Located at 2631 South Crenshaw  
Boulevard in Los Angeles (ENV-2014-2866)**

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 demolition of four commercial structures, four residential properties, one tree and two surface parking lots on a four-parcel site totaling approximately 26,416 square feet. After demolition is completed, construction is planned for a mixed-use residential/commercial building with 49-residential units and a manager's unit totaling approximately 73,078 square feet. In addition, the building would include approximately 5,642 square feet of retail/restaurant commercial uses. Parking is planned to include 68-spaces on two levels including one-subterranean level. Soil disturbance activities would include excavation with approximately 9,500 cubic yards of soil export.

### Quantification of Project Air Quality Impacts

#### Regional Impacts

The SCAQMD staff is concerned that the Lead Agency determined that project air quality impacts were less than significant without quantifying these potentially adverse impacts in the Draft MND. As a result of not quantifying air quality impacts, the Lead Agency has failed to demonstrate that the proposed project will not generate significant adverse 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 construction and operational air quality impacts using recognized resources such as the current California Emission Estimator Model (CalEEMod).<sup>1</sup> 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 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 on page three of the Draft MND to be implemented if the air quality impacts are determined to be significant.

#### Localized Significance Threshold Impacts

In addition to evaluating the above-mentioned air quality impacts, the SCAQMD recommends that the Lead Agency estimate localized air quality impacts to ensure that any nearby sensitive receptors are not adversely affected by the construction and operation activities that are occurring in close proximity. It is noted on page eight in the Draft MND under environmental settings and in an aerial map inspection, the proposed project is located within one-quarter mile of sensitive receptors (single- and multi-family residences) west of the proposed project. 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 website.<sup>4</sup>

#### SCAQMD Rules and Regulations/Health Effect Impacts

Further, the Final MND should discuss applicable SCAQMD Rules and/or Regulations including Rule 1403 –Asbestos Emissions from Demolition/Renovation Activities from the demolition of the commercial and residential structures and Rule 402 – Nuisance from potential odors that could potentially come from the auto-body shop located just south of the proposed site. Finally, the Final MND should discuss potential health risks to the proposed residents since toxic air contaminants may be emitted from an on-going auto body shop located adjacent to and just south of the project site and fueling operations at two nearby fueling stations, one located just north, across Jefferson Boulevard and the second east, across from the project site.

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.

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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>

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Sincerely,

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JB:GM

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