



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 Construction of a Single-Family Residence Project Located at 1369 N.
Londonderry Place in Hollywood (ENV-2014-3490-MND)**

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 a 2,808 square foot single-family-residence, a swimming pool and remove 24 trees before building a 7,780 square foot single-family-residence, which would include a basement, pool and five parking spaces on an approximate 18,820 square foot lot. Soil disturbance would include 4,874 cubic yards of soil. The project start and opening year dates were not included in the Draft MND.

Regional and Localized Construction and Operational Air Quality 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. In the Air Quality Section, the Lead Agency appears to have based its determination by using the screening tables in Chapter 6 of the SCAQMD's 1993 CEQA Air Quality Handbook (SCAQMD Handbook), which use the SCAQMD staff has not supported for a number of years because those screening tables are now outdated. In addition, the tables do not account for activities like excavation or for localized impacts. As a result of relying solely on the screening tables, instead of quantifying air quality impacts, the Lead Agency has failed to demonstrate 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 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 recognized resources such as 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) 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.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 eight under environmental settings and in an aerial map inspection, 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.

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

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>

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Sincerely,

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