



South Coast Air Quality Management District

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Mr. Tom Glick, Planning Associate
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Draft Mitigated Negative Declaration (Draft MND) for the Proposed Residential Development Located at 16140 W. Chase St., North Hills (ENV-2014-943-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 MND.

In the project description, the Lead Agency proposes to clear and grade 10.96 acres and construct 73 single family homes. It is unclear how much material will be graded or removed. The Project Description, Section VI – Grading, and Section VIII – Hazardous Materials Site indicate that 120,000 cubic yards, 20,000 cubic yards, and 100,000 cubic yards of material will be moved respectively. The SCAQMD staff recommends that the Lead Agency clarify or provide additional information on the proposed project in Final MND.

Additionally, the Air Quality Analysis prepared by LSA Associates Inc. (LSA Project NO. BOR 1401 – July 2014) fails to account for emissions related to off-site hauling of grading material. The SCAQMD staff recommends that the Lead Agency provide additional information on the proposed project and revise the Air Quality Analysis to account for the emissions from off-site hauling in the Final MND.

Since the proposed project is adjacent to sensitive land uses (i.e., residential dwellings north, east, and west of the project site), a localized air quality impact analysis is required. The Draft MND did not properly evaluate potential localized air quality impacts¹. The Lead Agency determined that the Source Receptor Area (SRA) was “Northwest Coastal Los Angeles County – SRA 2;” however, the project is located in “West San Fernando Valley – SRA 6.” Furthermore, the Lead Agency used a 5 acre Localized Significance Threshold (LST) screening threshold even though the project site is 10.96 acres and it is not clear how many acres will be disturbed on a daily basis. The SCAQMD staff recommends that the Lead Agency revise the Air Quality Analysis to correctly assess the potential localized air quality impacts during construction of the proposed project.

¹ The Localized Significance Threshold (LST) methodology and Mass Rate LST Look Up Table is available at:
<http://www.aqmd.gov/ceqa/handbook/LST/LST.html>

The SCAQMD staff is available to work with the Lead Agency to address these concerns and any other air quality questions that may arise. Please contact Jack Cheng, Air Quality Specialist at (909) 396-2448, if you have any questions regarding these comments. We look forward to reviewing and providing comments for the Final MND associated with this project.

Sincerely,

Jillian Baker

Jillian Baker, Ph.D.

Program Supervisor

Planning, Rule Development & Area Sources

JB:JC

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