



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL AND USPS:
Monique.Acosta@lacity.org

October 10, 2014

Ms. Monique Acosta, Planning Associate
City of Los Angeles, City Hall
Department of City Planning
200 N. Spring Street, 7th Floor
Los Angeles, CA 90012

Draft Initial Study/Mitigated Negative Declaration (DMND) for the Proposed Six-Story, 80-Room Hotel with Restaurant Space and Subterranean Parking Project Located at 5600, 5602 W. Hollywood Blvd and 1669-1681 N. St. Andrews Place in Hollywood (MND-NG-14-346-PL; ENV-2014-1277-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 construction of a six-story, 80-room 26,671 square foot hotel with 867 square feet of restaurant space plus at-grade and underground parking for 31 vehicles and 68 bicycles on a lot that is 9,514 square feet in size. Site excavation will include approximately 2,800 cubic yards of soil export.

Air Quality Analysis – Regional Impacts

In the air quality section starting on page 25, 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soil disturbance activities including excavation or localized impacts to surrounding sensitive receptors and use now outdated mobile source emission factors, relying solely on these tables does not demonstrate that short- and long-term air quality impacts are below significance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.

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 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'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 DMND starting on page two of the DMND to be implemented if the air quality impacts are determined to be significant.

Air Quality Analysis - Localized Emission Impacts

It is also recommended that the lead agency evaluate localized air quality impacts since it is noted on pages 10 and 26 of the DMND and in an aerial map inspection, the proposed project is located within one-quarter mile of sensitive receptors (next to multi-family residential properties and an elementary school) south, southwest and northeast 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.⁴

SCAQMD Rules and Regulations

In the Final MND, the Lead Agency should cite compliance with SCAQMD Rule 402 – Nuisance from potential odors that could potentially come from the auto-body shop located next to the proposed site and Rule 403 – Fugitive Dust. Finally, the Final MND should discuss potential health risks to the proposed residents from the existing auto body shop since toxic air contaminants may be emitted from the on-going auto body shop operations.

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>

Ms. Monique Acosta,
Planning Associate

3

October 10, 2014

Sincerely,

Jillian Baker

Jillian Baker, Ph.D.
Program Supervisor
Planning, Rule Development & Area Sources

JB:GM

LAC141002-07
Control Number