



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Draft Mitigated Negative Declaration (Draft MND) for the Proposed Five-Story, 61-Unit Multi-Family Residential Building Project Located at 11106-11118 W. Hartsook Street in the North Hollywood – Valley Village Area of the City of Los Angeles (ENV-2015-4124-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.

Project Description

In the project description, the Lead Agency proposes demolition of the existing seven residential dwelling units followed by the development of a five-story, 61-unit apartment building with a one and one-half level of subterranean parking structure for approximately 87 total automobiles and 67 bicycle parking spaces. The total floor area of the residential building is approximately 61,793 square feet on a lot approximately 0.52 acres in size. Soil disturbance activities will include the excavation of the below-grade garage, which will require approximately 9,818 cubic yards of soil export.

Documentation to Support the Lead Agency's Findings

The Lead Agency has determined that project air quality impacts would result in less than significant regional impacts¹ during construction and operation activities stating that the project air quality impacts were estimated using the California Emissions Estimator Model (CalEEMod). The construction and operational estimates were included in an air quality analysis cited on page 21 of the Draft MND.² In order to document the Lead Agency's findings, the SCAQMD staff recommends that the Final MND and all future CEQA documents included, at minimum, a summary of the construction and operational emission estimates that are compared with the applicable SCAQMD recommended

¹ Page 21 in the DMND lists the regional construction and operational thresholds of significance.

² Bluescape Environmental, Air Quality Analyses dated January 6, 2016.

threshold of significance in order to demonstrate the Lead Agency's findings. Without this documentation, the Lead Agency has not supported its findings in the circulated CEQA document. This information can be included in the narration, in table(s) or as an appendix.

Localized Significance Threshold Analysis

It is noted in an aerial map inspection and in the environmental settings section on page six that the proposed project is located within one-quarter mile of sensitive receptors (single- and multi-family residences surrounding the project site and an elementary school located northwest of the project site). Therefore, the SCAQMD staff recommends 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 website³. Should the Lead Agency conclude after its analyses that construction or operational air quality impacts exceed the SCAQMD daily significance thresholds, SCAQMD staff has compiled mitigation measures⁴ to be implemented, if the air quality impacts are determined to be significant.

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 Wong

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³ <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>

⁴ <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>