



# South Coast Air Quality Management District

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Planning Division  
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## **Review of the Draft Mitigated Negative Declaration (MND) for the Proposed 4725 N. Radford Ave. North Hollywood Valley Village Project**

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.

According to the project description, the Lead Agency proposes to construct a new 4-story, 47-ft. high residential building containing 21 apartment units, comprised of approx. 27,929 sf of floor area on a 12,000 sf site. The proposed building will provide a total of 42 automobile parking spaces & 24 bicycle parking spaces (21 long-term & 3 short-term). The project will involve the grading & export of approx. 9,000 cubic yards of dirt to accommodate 2 levels of subterranean parking. The project site is currently vacant. It was previously improved with a single-family dwelling, prior to finalization of the demolition permit to clear the lot in September 2015.

In the Draft MND, the Lead Agency has determined that project air quality impacts would result in less than significant impacts during construction and operation activities but did not quantify short- or long-term air quality emissions. Without quantifying project air quality impacts, the Lead Agency has not demonstrated 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 the current version of 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 gases (GHGs) emissions. The Lead Agency can also estimate project emissions by following the calculation

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<sup>1</sup> <http://www.aqmd.gov/home/regulations/ceqa/air-quality-modeling>

methodologies in Chapter 9 and the Appendix to Chapter 9 in the South Coast SCAQMD's CEQA Air Quality Handbook<sup>2</sup>.

The proposed project involves construction and demolition. However, the details including the type of the demolition debris, haul trips, vehicle miles traveled to the waste disposal site(s) were not described in the Draft MND. In addition, the approximate project start date, phasing and project completion date were also not included in the Draft MND.

It is noted in an aerial map inspection that the proposed project is located within one-quarter mile of sensitive receptors (multi-family residences) east, north, and south 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 website<sup>3</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>4</sup> to be implemented if the air quality impacts are determined to be significant.

Pursuant to Public Resources Code Section 21092.5, SCAQMD staff requests that the Lead Agency provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the final CEQA document. Further, staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Sam Wang, Air Quality Specialist – CEQA Section, at (909) 396-2649, if you have any questions regarding these comments.

Sincerely,

*Jillian Wong*

Jillian Wong, Ph.D.  
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Planning, Rule Development & Area Sources

Attachment

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<sup>2</sup> <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>

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

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