



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:
May.Sirinopwongsagon@lacity.org

December 12, 2014

Ms. May Sirinopwongsagon, Planning Associate
City of Los Angeles, City Hall
Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012

**Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) for the
Proposed 24-Single Family Residences on 24-Lots Project Located at 255-295 W. 8th
Street in San Pedro (ENV-2014-1880-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.

In the project description, the Lead Agency proposes to merge and re-subdivide seven vacant lots followed by construction of 24 single-family-residences on 24-separate lots. Upon request, the Lead Agency provided additional information for construction activities. During soil disturbance, the sloped property will be graded resulting in approximately 11,900 cubic yards of soil export. The soil disturbance and other construction activities would expose nearby sensitive receptor family residences adjoining the project site to emissions from on-site equipment (grading, loading soil for export, trenching, etc.), fugitive dust and haul truck emissions coming onto the project site, during loading and leaving the project site. The construction schedule, equipment list and construction assumptions were not included in the project description or air quality section in the Draft MND.

In the air quality section on page 11, the Lead Agency determined that project construction and operational air quality impacts were less than significant but did not quantify the proposed project's air quality impacts. The SCAQMD staff therefore recommends that the Final MND include a more detailed project description that would better describe the construction assumptions used to estimate the potential construction air quality impacts. Details should include the construction schedule broken down by construction phase (demolition, soil disturbance, building construction, etc.); the total and daily amounts of soil that will be disturbed; a construction equipment list (the numbers and types of equipment, hours operated each day); numbers of haul trucks including the estimated distances to the soil disposal sites;, etc. Further, 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.

For estimating regional and localized project impacts, the current California Emission Estimator Model (CalEEMod)¹ land use emissions model is available that can quantify potential project criteria pollutant and also greenhouse (GHG) emissions. Project emissions can also be estimated by following the calculation methodologies in Chapter 9 and the Appendix to Chapter 9 in the 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 Draft MND starting on page two of the Draft MND to be implemented if the air quality impacts are determined to be significant.

Localized air quality impacts should also be evaluated since sensitive receptors (family residences) are located adjacent to the project site and would potentially be adversely impacted by the construction and excavation activities occurring at the site. SCAQMD guidance for performing a localized air quality analysis can also be found at the SCAQMD website.⁴

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 Baker

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

JB:GM

LAC141127-08
Control Number

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>