



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:

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Tom.Glick@lacity.org

Darlene.Navarrete@lacity.org

Mr. Tom Glick, City Planner
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 22 Single Family Dwellings Project Located at 13245 W. Hubbard Street
in Sylmar (ENV-2014-3375-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.

The SCAQMD staff recommends that the Final MND include a more detailed project description including construction assumptions in the air quality section to allow evaluation of its findings that project air quality impacts are less than significant. Details should include but are not limited to 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, number hours operated each day, etc.); and if any soil import/export is expected (total and daily amount of soil hauled, number of trucks, etc.), as applicable. Further, in the air quality section on page 15, the Lead Agency determined that project short- and long-term air quality impacts were less than significant but did not quantify those impacts. The SCAQMD staff recommends that project construction and operational impacts be quantified and compared with recognized regional and localized 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

¹ <http://www.aqmd.gov/ceqa/models.html>

² <http://www.aqmd.gov/ceqa/hdbk.html>

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 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

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³ http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html

⁴ <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>