



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, Mixed-Use Residential and Commercial Building Project Located at 11612 West Culver Boulevard in the Palms-Mar Vista-Del Rey Area of the City of Los Angeles (ENV-2015-4523-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 construction of a five-story, mixed-use building on a lot approximately 0.29 acres in size. The proposed development will include 47 residential units and approximately 1,700 square feet of commercial space. Excavation for two levels of subterranean parking will occur in order to provide spaces for 62 vehicles and stalls for 66 bicycles. The proposed project occupies a lot approximately 0.29 acres in size. The amount of soil excavation for the below-level garage, number of daily haul trips for the soil export, distances to the disposal site and other related assumptions should be included in the Final MND.

Documentation to Support the Lead Agency's Findings

The Lead Agency has determined that project air quality impacts would result in impacts that are less than significant for regional and localized significance thresholds¹ during construction and operation activities stating that the project air quality impacts were estimated using the results from the California Emissions Estimator Model (CalEEMod) for similar types of projects. In order to document the Lead Agency's findings using a surrogate project, the SCAQMD staff recommends that the Final MND and all future CEQA documents include, at minimum, a summary of the similar project's project description to allow a person reading the document to see that the example project is a

¹ Starting on Page 17 of the DMND.

fair comparison to the proposed project and the assumptions included in the modeling. In addition, the Final MND should also include a summary of the similar project's estimated construction and operational emission estimates, which then should be compared with the applicable SCAQMD recommended threshold of significance in order to demonstrate the Lead Agency's findings. This information can be included in the narration, in table(s) or as an appendix. Without this documentation, the Lead Agency has not supported its findings in the circulated CEQA document.

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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JW:GM

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