



STOWELL, ZEILENGA, RUTH,  
VAUGHN & TREIGER LLP

ATTORNEYS AT LAW

4680 E. THOUSAND OAKS BLVD. • SUITE 100  
WESTLAKE VILLAGE, CA 91362

TEL: (805) 446-1496 • FAX: (805) 446-1490  
www.szrlaw.com

DAVID T. STOWELL  
RICHARD S. ZEILENGA  
JAMES D. VAUGHN  
ADAM K. TREIGER

DAVID C. RUTH  
RETIRED  
ERIC H. HALVORSON  
OF COUNSEL

November 7, 2014

*Via E-Mail and U.S. Mail*

Ms. Sharon Gin  
Office of City Clerk  
City Hall  
200 N. Spring Street, Room 395  
Los Angeles, CA 90012

Re: Appeal From: Appeal from the Board of Building & Safety Commissioners  
Appeal To: The City Council  
Regarding Case No: Board File Number 140089, ENV-2014-962-MND  
Project Address: 10830 W. Chalon Road  
Final Date To Appeal: November 7, 2014

Dear Ms. Gin:

Yesterday we filed an appeal on behalf of the Bel Air Homeowners Alliance (the "Alliance") regarding the above-referenced project. Our appeal made reference to an expert opinion regarding localized air quality impacts caused by the Project, submitted by legal counsel for Helen Zukin, a neighboring property owner. A copy of the referenced expert opinion letter from Pomeroy Environmental Services is attached.

Best regards,

A large, stylized handwritten signature in black ink, appearing to read 'Richard S. Zeilenga'.

Richard S. Zeilenga  
For the Firm

RSZ:bsm  
Enclosure



October 27, 2014

[via email: nb4@JMBM.com]

Mr. Neill E. Brower

**Jeffer Mangels Butler & Mitchell LLP (JMBM)**

1900 Avenue of the Stars, 7<sup>th</sup> Floor

Los Angeles, California 90067

**Re: Air Quality Analysis for the Project located at 10830 West Chalon Road in the City of Los Angeles (ENV-2014-962-MND)**

Dear Mr. Brower:

**Pomeroy Environmental Services (PES)** presents the following air quality analysis regarding the MND (ENV-2014-962-MND) prepared by the City of Los Angeles (City) for the Project located at 10830 West Chalon Road in the City.

PES is an independently owned and operated environmental consulting firm. Brett Pomeroy, President/Owner, has over 10 years of professional experience in the environmental planning field with an emphasis in environmental compliance pursuant to the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA). Specifically, Mr. Pomeroy has extensive experience in the preparation of technical studies associated with air quality.

Based on our communications, PES has reviewed the contents of ENV-2014-962-MND and associated Haul Route application for the Project. As stated in these documents, the Project includes the demolition of an existing 2,708 square foot (sf) house and the construction of a single-family home totaling 7,733 sf on a 28,980 sf site (0.67 acres). The Project will require 9,802 cubic yards (cy) of soil export. The soil will be hauled off site in 24 hauling days, requiring 30 trips per day (14 cy per truck) and will travel an approximate distance of 24.9 miles one way to the dump site at 7721 N. Figueroa Street, Los Angeles, CA 90041. The following discussion includes the methodology/assumptions utilized in this analysis, and a summary of the potential localized and regional air quality impacts associated with the construction of the Project as outlined above.

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## **Regional Construction Impacts**

### *Demolition Phase*

This phase would include the demolition of the existing 2,708 sf house. The demolition would be completed in approximately 10 days. This analysis assumes daily on-site demolition activities would require the following equipment: one concrete/industrial saw, one rubber tired dozer, and two tractors/loaders/backhoes. For purposes of modeling the emissions associated with this equipment fleet, it was conservatively estimated that each piece of equipment would be operated for 8 hours each day.

### *Grading/Excavation/Foundations Phase*

The grading/excavation/foundation phase for the Proposed Project would occur for 24 days and would involve the cut and fill of land to ensure the proper base and slope for the foundations of the proposed building. The Project will require 9,802 cy of soil export. The soil will be hauled off site in 24 hauling days, requiring 30 trips per day (14 cy per truck) and will travel an approximate distance of 24.9 miles one way to the dump site at 7721 N. Figueroa Street, Los Angeles, CA 90041. This analysis assumes daily grading/excavation/foundation activities would require the following equipment: one concrete/industrial saw, one grader, one dozer, and two tractors/loaders/backhoes. For purposes of modeling the emissions associated with this equipment fleet, it was conservatively estimated that each piece of equipment would be operated for 8 hours each day.

### *Building Construction Phase*

The building construction phase consists of the physical construction of the proposed structure and is expected to occur for approximately 11 months. This analysis assumes that the maximum daily construction building activities would require the following equipment: one crane, two forklifts, one generator set, two tractors/loaders/backhoes, and one air compressor. For purposes of modeling the emissions associated with this equipment fleet, it was conservatively estimated that each piece of equipment would be operated for 8 hours each day.

The analysis of daily construction emissions has been prepared utilizing the California Emissions Estimator Model (CalEEMod 2013.2.2) recommended by the SCAQMD. Due to the construction time frame and the normal day-to-day variability in construction activities, it is difficult, if not impossible, to precisely quantify the daily emissions associated with each phase of the proposed construction activities. Nonetheless, Table 1, Estimated Peak Daily Regional Construction Emissions, identifies daily emissions that are estimated to occur on peak construction days for

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each construction phase. These calculations assume that appropriate dust control measures would be implemented as part of the Proposed Project during each phase of development, as required by SCAQMD Rule 403 - Fugitive Dust. Specific Rule 403 control requirements include, but are not limited to, applying water in sufficient quantities to prevent the generation of visible dust plumes, applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the Project Site, and maintaining effective cover over exposed areas. As stated in the MND, this analysis assumes watering of exposed dirt areas twice per day. As shown in Table 1, construction-related daily emissions associated with the Proposed Project would not exceed any regional SCAQMD significance thresholds for criteria pollutants during the construction phases. Therefore, regional construction impacts are considered to be less than significant.

#### **Localized Construction Impacts**

The SCAQMD has developed localized significance threshold (LST) look-up tables for project sites that are one, two, and five acres in size to simplify the evaluation of localized emissions at small sites. LSTs are provided for each SRA and various distances from the source of emissions. In the case of this analysis, the Project Site is located within SRA 2 (Northwest Los Angeles County Coastal) and the nearest sensitive receptors are adjacent residential uses. The closest receptor distance in the SCAQMD's mass rate look-up tables is 25 meters. Projects that are located closer than 25 meters to the nearest receptor are directed to use the LSTs for receptors located within 25 meters. Also, as the Project Site is less than one acre in size (0.67 acres), the SCAQMD recommends the application of the LSTs for a one acre site. Therefore, the LSTs for a one-acre site in SRA 2 with receptors located within 25 meters have been used to address the potential localized NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> impacts to the area surrounding the Project Site.

Emissions from construction activities have the potential to generate localized emissions that may expose sensitive receptors to harmful pollutant concentrations. These calculations assume that appropriate dust control measures would be implemented as part of the Proposed Project during each phase of development, as required by SCAQMD Rule 403 - Fugitive Dust. Specific Rule 403 control requirements include, but are not limited to, applying water in sufficient quantities to prevent the generation of visible dust plumes, applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the Project Site, and maintaining effective cover over exposed areas. As stated in the MND, this analysis assumes watering of exposed dirt areas twice per day.

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As shown in Table 2, Localized On-Site Peak Daily Construction Emissions, peak daily emissions generated within the Project Site during the grading/excavation/foundation phase could exceed the LST in SRA 2 for PM<sub>10</sub> and PM<sub>2.5</sub>. Construction activities for demolition and building construction would not exceed the applicable construction LSTs for a SRA 2. Therefore, localized air quality impacts from construction activities on the off-site sensitive receptors would be potentially significant.

**Table 1**  
**Estimated Peak Daily Regional Construction Emissions**

Emissions Source	Emissions in Pounds per Day					
	CO <sub>2</sub>	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Demolition Phase</b>						
Fugitive Dust	--	--	--	--	0.12	0.02
Off-Road Diesel Equipment	2.79	26.94	19.77	0.02	1.66	1.56
On-Road Diesel (Hauling)	0.03	0.45	0.32	0.01	0.03	0.01
Worker Trips	0.06	0.08	0.80	0.01	0.11	0.03
<b>Total Emissions</b>	<b>2.88</b>	<b>27.47</b>	<b>20.89</b>	<b>0.04</b>	<b>1.92</b>	<b>1.62</b>
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No
<b>Grading/Excavation/Foundation Phase</b>						
Fugitive Dust	--	--	--	--	2.74	1.49
Off-Road Diesel Equipment	4.11	37.56	24.90	0.03	2.53	2.36
On-Road Diesel (Hauling)	1.67	27.55	17.57	0.06	1.80	0.82
Worker Trips	0.06	0.08	0.80	0.01	0.11	0.03
<b>Total Emissions</b>	<b>5.84</b>	<b>65.19</b>	<b>43.27</b>	<b>0.10</b>	<b>7.18</b>	<b>4.70</b>
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No
<b>Building Construction Phase</b>						
Building Construction Off-Road Diesel Equipment	2.59	24.15	13.12	0.02	1.66	1.55
Building Construction Vendor Trips	0.00	0.00	0.00	0.00	0.00	0.00
Building Construction Worker Trips	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total Emissions</b>	<b>2.59</b>	<b>24.15</b>	<b>13.12</b>	<b>0.02</b>	<b>1.66</b>	<b>1.55</b>
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No
<i>Note: Calculations assume compliance with SCAQMD Rule 403 – Fugitive Dust. Calculation sheets are attached to this letter.</i>						

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**Table 2**  
**Localized On-Site Peak Daily Construction Emissions**

Construction Phase <sup>a</sup>	Total On-site Emissions (Pounds per Day)			
	NO <sub>x</sub> <sup>b</sup>	CO	PM <sub>10</sub>	PM <sub>2.5</sub>
<b>Demolition Emissions</b>	<b>26.94</b>	<b>19.77</b>	<b>1.78</b>	<b>1.58</b>
SCAQMD Localized Thresholds	103.00	562.00	4.00	3.00
Potentially Significant Impact?	No	No	No	No
<b>Grading/Excavation/Foundation Emissions</b>	<b>37.56</b>	<b>24.90</b>	<b>5.27</b>	<b>3.85</b>
SCAQMD Localized Thresholds	103.00	562.00	4.00	3.00
Potentially Significant Impact?	No	No	<b>YES</b>	<b>YES</b>
<b>Building Construction Emissions</b>	<b>24.15</b>	<b>13.12</b>	<b>1.66</b>	<b>1.55</b>
SCAQMD Localized Thresholds	103.00	562.00	4.00	3.00
Potentially Significant Impact?	No	No	No	No

Note: Calculations assume compliance with SCAQMD Rule 403 – Fugitive Dust.

<sup>a</sup> The localized thresholds for all phases are based on a one-acre site with a receptor distance of 25 meters (82 feet) in SCAQMD's SRA 2.

<sup>b</sup> The localized thresholds listed for NO<sub>x</sub> in this table takes into consideration the gradual conversion of NO<sub>x</sub> to NO<sub>2</sub>, and are provided in the mass rate look-up tables in the "Final Localized Significance Threshold Methodology" document prepared by the SCAQMD. As discussed previously, the analysis of localized air quality impacts associated with NO<sub>x</sub> emissions is focused on NO<sub>2</sub> levels as they are associated with adverse health effects.

Calculation sheets are attached to this letter.

Based on the above, the Project's generation of air quality emissions would be considered less than significant for regional impacts and potentially significant for localized impacts. Mr. Brower, if you have any questions related to the information provided herein, please call me at (661) 388-2422 or e-mail me at [brett@pomeroyes.com](mailto:brett@pomeroyes.com).

Sincerely,

**Pomeroy Environmental Services (PES)**



Brett Pomeroy  
 President/Owner

Attachment A: Construction Air Quality Emissions Calculation Data

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