



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

April 12, 2017

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Draft Environmental Impact Report (Draft EIR) for the Proposed 6901 Santa Monica Boulevard Mixed-Use 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 EIR.

In the project description, the Lead Agency proposes to demolish the existing structure and construct a mixed-use building. The mixed-use building will provide 231 multi-family units, 15,000 square feet of commercial space, and two levels of subterranean parking. In the air quality analysis, the Lead Agency found that regional and localized construction and operational emissions would be less than significant.

Air Quality Analysis

The goal of an EIR is to inform other governmental agencies and the public generally of the environmental impacts of a proposed project (CEQA Guidelines Section 15003(c)). As the EIR is an informational document, it should provide the information to facilitate public disclosure (CEQA Guidelines Sections 15120, and 15121). Based on a review of the Air Quality Modeling report for the proposed project, the SCAQMD staff found that air emissions from subterranean parking were not calculated. Therefore, the Draft EIR has likely underestimated the project's air quality impacts. The SCAQMD staff recommends calculating emissions from subterranean parking and including them in the Final EIR.

Mitigation Measure

In the Draft EIR, the Lead Agency found that the air quality impacts from construction of the proposed project would be less than significant and that no mitigation measures were required. Based on a review of the construction emissions in Table 6-4, *Comparison of Net Regional Construction Emissions*, of the Draft EIR and the supporting Appendix D, *AQ and GHG Modeling*, the SCAQMD staff found that Tier 4 construction equipment was used to calculate the mitigated construction emissions from NO_x, PM₁₀, and PM_{2.5} as substantial evidence to support the Lead Agency's finding. However, the use of Tier 4 construction equipment was not included as a mitigation measure. To ensure that air quality impacts from NO_x, PM₁₀, and PM_{2.5} during construction are adequately mitigated, and to be consistent with the air quality modeling assumption, SCAQMD staff recommends that the Lead Agency commit to using Tier 4 for all off-road construction equipment greater than 50 hp and include the following mitigation measure in the Final EIR:

Mitigation Measure: All off-road construction equipment greater than 50 hp shall meet U.S. EPA Tier 4 emission standards to reduce NO_x, PM₁₀, and PM_{2.5} emissions at the project site.

Pursuant to Public Resources Code Section 21092.5 and the CEQA Guidelines Section 15088, SCAQMD staff requests that the Lead Agency provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final EIR. Further, when the Lead Agency makes the finding that the above-mentioned mitigation measure is infeasible, the Lead Agency shall describe the specific reasons for rejecting it in the Final EIR (CEQA Guidelines Section 15091).

SCAQMD staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Jack Cheng, Air Quality Specialist, CEQA IGR Section, at (909) 396-2448, if you have any questions regarding the enclosed comments.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS:JC

LAC170307-01

Control Number