



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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**Mitigated Negative Declaration (MND) for the Proposed
1048, 1054 & 1060 S. Oxford Ave. (3127-3133 W. 11th St. & 1056 S. Oxford Ave.)
(ENV-2016-4127)**

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.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to demolish the existing buildings and construct a seven-story building with 49 residential units and subterranean parking with 115 vehicle parking spaces on 19,733 square feet (Proposed Project). During the course of construction, approximately 5,608 cubic yards of soil will be exported during soil disturbance activities.

Regional Air Quality Analysis

In the MND, the Lead Agency has determined that the Proposed Project's air quality impacts would be less than significant during construction and operation but did not quantify short- or long-term air quality emissions. These air quality impacts should be quantified in order to demonstrate, supported by substantial evidence, that the Proposed Project will not generate significant adverse construction or operational air quality impacts that may trigger further analysis and mitigation measures pursuant to the California Environmental Quality Act (CEQA). Therefore, SCAQMD staff recommends that the Lead Agency estimate the Proposed Project's short- and long-term air quality impacts using the current version of California Emission Estimator Model (CalEEMod),¹ which is a statewide land use emissions model that can quantify potential project criteria pollutant and greenhouse gases (GHGs) emissions. Project emissions can also be estimated by following the calculation methodologies in Chapter 9 and the Appendix to Chapter 9 in the South Coast SCAQMD's CEQA Air Quality Handbook².

Localized Significance Thresholds Analysis

Based on the information in the environmental settings and a review of aerial maps, SCAQMD staff found that the Proposed Project is surrounded by existing single-family and multi-family residences. Therefore, SCAQMD staff recommends that the Lead Agency evaluate localized air quality impacts to ensure that any nearby sensitive receptors are not adversely affected by the construction activities that are occurring in close proximity. SCAQMD guidance for performing a localized air quality analysis can be found at the

¹ The California Emissions Estimator Model® (CalEEMod). Version 2016.3.2. Accessed at: <http://caleemod.com/>.

² South Coast Air Quality Management District. SCAQMD's CEQA Air Quality Handbook. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.

SCAQMD website³. In the event that the Lead Agency concludes after its analyses that construction or operational air quality impacts exceed the SCAQMD air quality CEQA significance thresholds, staff has compiled mitigation measures⁴ to be implemented if the air quality impacts are determined to be significant.

Compliance with SCAQMD Rule

Based on the project description, the proposed project includes demolition. As such, asbestos may be encountered during demolition activities, and the Lead agency should discuss and provide additional information regarding compliance with SCAQMD Rule 1403 -- Asbestos Emissions from Demolition/Renovation Activities in the Final MND.

Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process. Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final MND. SCAQMD staff is available to work with the Lead Agency to address these issues and any other air quality questions that may arise. Please contact me by e-mail at lsun@aqmd.gov, if you have any questions regarding these comments.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

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Control Number

³ South Coast Air Quality Management District. Localized Significance Thresholds. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

⁴ South Coast Air Quality Management District. <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>.