



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 1729-1743 N Naud St; Central City North (ENV-2017-655) Project

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comment is meant as guidance for the Lead Agency and should be incorporated into the Final MND.

Project Description

The Lead Agency proposes to demolish an 890-square-foot chemical dispensing building and construct a 1,070-square-foot building, a 5,895-square-foot second floor to the existing warehouse, a 3,219-square-foot outdoor patio, and a 14,607-square-foot public facility with 367 seats on an approximately 114,829-square-foot site. Historically, the project site has been used for chemical and petroleum blending and distribution purposes.

Air Quality Analysis

Based on a review of the air quality analysis in the MND, SCAQMD staff found that the Lead Agency did not quantify the proposed project's emissions from construction activities. One of the basic purposes of CEQA is to inform governmental decision makers and the public about the potential, significant environmental effects of proposed activities (CEQA Guidelines Section 15002(a)(1)). A mitigated negative declaration is appropriate when the Lead Agency finds that the project will not have a significant effect on the environment after incorporating mitigation measures (CEQA Guidelines Sections 15070 to 15075). Reasons to support this finding shall be documented in the initial study. Without quantifying the proposed project's air emissions, the MND for this proposed project has not made that documentation which serves as substantial evidence to support a fair argument that the proposed project would not have any adverse effects on air quality. Therefore, SCAQMD staff recommends that the Lead Agency calculate construction emissions and compare those emissions to the SCAQMD's CEQA significance thresholds¹ in the Final MND.

The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. SCAQMD staff recommends that the Lead Agency use this Handbook as guidance to prepare the air quality analysis in the Final MND. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720. More recent guidance developed since this Handbook was published is also available on SCAQMD's website here: www.aqmd.gov/ceqa/hdbk.html. SCAQMD staff also recommends that the Lead Agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model

¹ South Coast Air Quality Management District. *SCAQMD Air Quality Significance Thresholds*. Available at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2>.

maintained by the California Air Pollution Control Officers Association (CAPCOA) and is available free of charge at: www.caleemod.com.

Compliance with SCAQMD Rules

Based on a review of the project description, SCAQMD staff found that the proposed project would include demolition. Therefore, it is recommended that the Lead Agency include a discussion to demonstrate compliance with SCAQMD Rule 1403 – Asbestos Emissions from Demolition/Renovation in the Final MND. Additionally, since the proposed site was used for chemical and petroleum blending and distribution purpose, in the event that petroleum hydrocarbons are expected to be encountered during construction, the Final MND should include a discussion to demonstrate compliance with the requirements of SCAQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil.

Pursuant to the 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. SCAQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Jack Cheng, Air Quality Specialist, CEQA IGR Section, at (909) 396-2448, if you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS:JC

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