



South Coast Air Quality Management District

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March 3, 2017

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Mitigated Negative Declaration (MND) for the Proposed Demolition of Existing Structures and Construction of a 55,434-Square-Foot, 5-Story Apartment Complex in the Wilshire Area of the City of Los Angeles (ENV-2016-2995)

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

Based on the project description, the Lead Agency proposes to demolish an existing two-story, 15,900-square-foot commercial building along with a multi-family residential building on a project site consisting of three contiguous lots, approximately 0.43 of an acre in size. After demolition, a five-story, an approximately 55,434-square-foot apartment hotel with 86 guest-rooms will be constructed over a subterranean garage with 72 parking spaces. During the course of construction, approximately 10,000 cubic yards of soil will be exported during soil disturbance activities.

Regional Air Quality Analysis

In the MND, the Lead Agency has determined that project's air quality impacts are 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 pursuant to the California Environmental Quality Act (CEQA). Therefore, the SCAQMD staff recommends that the Lead Agency estimate project 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.

¹ <http://www.aqmd.gov/home/regulations/ceqa/air-quality-modeling>

² <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>

Localized Significance Thresholds Analysis

Based on the information in the environmental settings and a review of aerial maps, the SCAQMD staff found that the proposed project is located within one-quarter mile of sensitive receptors (multi-family residences) south, east and west of the project site. Therefore, the 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 SCAQMD website³. In the event that the Lead Agency concludes after its analyses that construction or operational air quality impacts exceed the SCAQMD daily significance thresholds, staff has compiled mitigation measures⁴ to be implemented if the air quality impacts are determined to be significant.

Compliance with SCAQMD Rules

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. In the event that soil containing petroleum hydrocarbons are encountered during soil disturbance activities, that portion of the proposed project will be subject to the requirements of SCAQMD 1166- Volatile Organic Compound Emissions from Decontamination of Soil. The Final MND should also discuss and provide additional information regarding compliance with SCAQMD Rule 1166.

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 air quality questions that may arise. Please contact Gordon Mize, Air Quality Specialist, CEQA IGR, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

Lijin Sun

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LS:GM

LAC170223-01
Control Number

³ <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>

⁴ <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>