Sent via e-mail and USPS: acastillo@weho.org

Mr. Antonio Castillo, Associate Planner
City of West Hollywood
Community Development Department
8300 Santa Monica Boulevard
West Hollywood, CA 90069

April 20, 2017

Negative Declaration (ND) for the Proposed
923-931 North Palm Avenue Senior Congregate Care Facility 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 ND.

Project Description
In the project description, the Lead Agency proposes to demolish the existing residential structures on the approximately 0.44-acre site, rehabilitate two historically significant bungalows, and construct a four-story senior living facility with a total of 49 units. The proposed project would include a subterranean parking level with 25 spaces. The overall floor area would be approximately 31,398 square feet. The proposed project is surrounded by mostly multi-family residential buildings. Project construction is expected to take approximately six months beginning in September 2017 and completed in February 2018.

Compliance with SCAQMD Rule 1403 during Demolition /Renovation Activities
In the air quality section on age 29 of the ND, the Lead Agency discussed compliance with SCAQMD Rule 403 – Fugitive Dust and Rule 1113 – Architectural Coatings. In the event that asbestos is encountered during demolition and rehabilitation, the Lead Agency should include a discussion to demonstrate compliance with SCAQMD Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities in the Final ND.

Please provide the SCAQMD staff with written responses to all comments contained herein prior to the adoption of the Final ND. SCAQMD staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA IGR Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

Lijin Sun
Lijin Sun, J.D.
Program Supervisor, CEQA IGR
Planning, Rule Development & Area Sources

LS:GM
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