



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL AND USPS:

November 14, 2018

Rachel.kwok@smgov.net

Attn: Rachel Kwok, Environmental Planner
City Planning Division
1685 Main Street, Room 212
Santa Monica, CA 90401

Draft Environmental Impact Report (DEIR) for the Proposed City Yards Master Plan Project

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 CEQA document.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to demolish and redevelop 16 existing buildings totaling 68,221 square feet, and construction of 366,389 square feet of new industrial buildings on 14.2 acres. The project is located at 2500 Michigan Avenue on the southeast corner of Michigan Avenue and 24th Street in the City of Santa Monica.

SCAQMD Rules & Permits

A portion of the proposed project lies over a former landfill and could potentially disrupt the landfill gas collection system and methane mitigations systems in place. Therefore, the following SCAQMD rules may be applicable and a discussion of the existing rules should be incorporated into the final CEQA document:

- Rules 201/203 – Permit to Construct / Permit to Operate
- Rule 1150 – Excavation of Landfill Sites
- Rule 1150.1 – Control of Gaseous Emissions from Municipal Solid Waste Landfills
- Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil
- Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities

Additionally, given the type of operations expected to occur onsite, the following SCAQMD rules may be applicable and a discussion of the existing rules should also be incorporated into the final CEQA document:

- Rule 461 – Gasoline Transfer and Dispensing
- Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion And Other Compression Ignition Engines
- Rule 1150.1 – Control of Gaseous Emissions from Municipal Solid Waste Landfills

In the event that the proposed project requires a permit from SCAQMD, SCAQMD should be identified as a responsible agency in the final CEQA document. Any assumptions used in the air quality analysis in the certified final CEQA document will be the basis for permit conditions and limits. For more information on permits, please visit SCAQMD's webpage at: <http://www.aqmd.gov/home/permits>. Questions on permits can be directed to SCAQMD's Engineering and Permitting staff at (909) 396-3385.

Response to Comments

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), SCAQMD staff requests that the Lead Agency provide SCAQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful or useful to decision makers and to the public who are interested in the proposed project.

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 Alina Mullins, Assistant Air Quality Specialist, at amullins@aqmd.gov or (909) 396-2402, should you have any questions.

Sincerely,

Jillian Wong

Jillian Wong, Ph.D.

Planning and Rules Manager

Planning, Rule Development & Area Sources

JW/AM

LAC181002-13

Control Number