



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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11333 Valley Boulevard
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Mitigated Negative Declaration (MND) for the Proposed El Monte Green Group, LLC and Green Mountain Alliance, LLC

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.

The Lead Agency is proposing to demolish 6,500 square feet of existing structures and remodel approximately 132,908 square feet within the six remaining buildings on 4.9 acres (Proposed Project). Due to the age of the existing buildings, the Lead Agency requires that “[t]he Applicant and the contractors must adhere to all requirements governing the handling, removal, and disposal of asbestos-containing materials lead paint, and other hazardous substances and materials that may be encountered during tenant improvement activities [...]”¹ (Mitigation Measure No. 6). SCAQMD staff recommends that the Lead Agency review SCAQMD Rule 1403, Asbestos Emissions from Demolition/Renovation², and include a discussion to demonstrate that the Proposed Project will comply with SCAQMD Rule 1403 in the Air Quality Section of 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. When responding to issues raised in the comments, response should provide sufficient details 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 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 me at lsun@aqmd.gov if you have any questions.

Sincerely,

Lijin Sun

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

LS
LAC190109-01
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¹ MND. Page 66.

² South Coast Air Quality Management District. Rule 1403. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1403.pdf>.