



South Coast Air Quality Management District

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E-mailed: September 1, 2011
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Ms. Jing Yeo
City Planning Division
1685 Main Street, Room 212
Santa Monica, CA 90401

Review of the Draft Environmental Impact Report (Draft EIR) for the 710 Wilshire Boulevard Project

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document. The following comment is intended to provide guidance to the lead agency and should be incorporated into the final Environmental Impact Report (final EIR) as appropriate.

The air quality analysis provided in the draft EIR states that the proposed project will have insignificant air quality impacts. However, the lead agency's localized air quality analysis does not clearly demonstrate the project's PM10 emissions impacts during construction and may deviate EPA-recommended guidance for estimating on-road fugitive dust. Specifically, the lead agency does not disclose sufficient information (i.e., number of vehicles traveling on construction roads) to calculate the project's PM10 emissions impacts of 44.59 lbs/day unmitigated (Table 4.3-8) and 4.01 lbs/day mitigated (Table 4.3-9). As a result, the AQMD staff is concerned about the project's potential significant localized impacts to sensitive land uses (i.e., residences and parks) surrounding the project site. Therefore, the lead agency should revise the technical appendix of the draft EIR to demonstrate the project's localized construction PM10 emissions impacts and verify how the proposed mitigation measure could achieve the stated 90% efficiency.

In the event that the lead agency determines the proposed project will result in significant localized impacts the lead agency should require additional mitigation pursuant to CEQA Guidelines §15126.4. Additional measures to reduce construction emissions can be found at: www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html

Pursuant to Public Resources Code Section 21092.5, please provide the AQMD with written responses to all comments contained herein prior to the adoption of the final EIR. Further, staff is available to work with the lead agency to address these issues and any

other questions regarding air quality that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,

A handwritten signature in black ink that reads "Ian V. MacMillan". The signature is written in a cursive style with a large initial "I" and "M".

Ian MacMillan

Program Supervisor, CEQA Inter-Governmental Review
Planning, Rule Development & Area Sources

Attachment

IM:DG

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Control Number