South Coast
Air Quality Management District

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Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) for the Proposed Five-Story, 23-Unit Residential Building With Subterranean Parking Project Located at 1021-1025 S. Shenandoah Street in the Wilshire Area in Los Angeles (MND-NG-15-184-PL; ENV-2014-4729)

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 CEQA document.

In the project description, the Lead Agency proposes to build a five-story, approximately 37,715 square foot, 23-unit residential building. Parking will be located in a two-level subterranean parking structure that will include 45 parking spaces. The proposed project is located on two lots and on an approximately 14,107 square foot (0.32 acre) site. The project will also require approximately 9,950 cubic yards of soil export resulting from excavation of the garage and other soil disturbance. The estimated construction start and completion dates were not included in the Draft IS/MND.

On page nine in the Air Quality Section, the Lead Agency determined that project air quality impacts would result in less than significant impacts to nearby residences during construction activities but did not quantify project air quality impacts for short- term activities. Without quantifying project air quality impacts, the Lead Agency has not demonstrated that the proposed project will not generate significant adverse construction air quality impacts that may trigger further analysis pursuant to the California Environmental Quality Act. Therefore, the SCAQMD staff recommends that the Lead Agency demonstrate that project impacts are less than significant in the Final MND by estimating construction air quality impacts using the current California Emission Estimator Model (CalEEMod) .[1] CalEEMod is a statewide land use emissions model that can quantify potential project criteria pollutant and greenhouse (GHG) emissions. The Lead Agency can also estimate project emissions by following the calculation

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[1] http://www.aqmd.gov/ceqa/models.html

methodologies in Chapter 9 and the Appendix to Chapter 9 in the South Coast SCAQMD's CEQA Air Quality Handbook.[2]

Should the Lead Agency conclude after its analyses that construction or operational air quality impacts exceed the SCAQMD daily significance thresholds, staff has compiled mitigation measures[3] in addition to the measures described in the Air Quality Section narration starting on page 17. Although some mitigation measures from SCAQMD Rule 403 (Fugitive Dust) are included in the narration on page 17, these measures are not included in the mitigation section starting on page two. The Lead Agency is reminded, however, that complying with a law, rule, e.g., SCAQMD Rule 403 (Fugitive Dust), regulation, etc., is not considered mitigation because it is a requirement. Rather, the Final MND should include the specific measures from SCAQMD Rule 403 in the Final MND and incorporate those specific measures into each applicable air quality analysis to demonstrate that the Lead Agency's findings.

Besides the general emission impacts based on the project description, the project specific emission estimates should also include haul truck and associated emissions during demolition and soil export from trucks carrying debris and excavated soil from the project site to a disposal area(s). Basic assumptions used to estimate those emissions, e.g., the number and types of daily haul trucks, distance(s) to the haul site(s), etc., should also be included. Further, the Lead Agency should describe compliance with SCAQMD rules and regulations including, but not limited to, Rule 1403 - Asbestos Emissions from Demolition/Renovation Activities and Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil should the demolition include materials that contain asbestos (Rule 1403) or Volatile Organic Compounds (VOC) are encountered during excavation (Rule 1166)**.**

It is also recommended that the Lead Agency evaluate localized air quality impacts since it is noted on page four of the Draft IS/MND and in an aerial map inspection, the proposed project is located within one-quarter mile of sensitive receptors (single- and multi-family residences) adjacent to the proposed project. Therefore, the SCAQMD staff requests 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 also be found at the SCAQMD website.[4]

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

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[2] http://www.aqmd.gov/ceqa/hdbk.html
[3] http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies
[4] http://www.aqmd.gov/ceqa/handbook/LST/LST.html

Sincerely,

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