



South Coast Air Quality Management District

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Draft Mitigated Negative Declaration (Draft MND) for the Proposed 33-Story Mixed-Use Building Project Located on Hill and 4th Streets in the Central City Area of the City of Los Angeles (ENV-2015-0982-MND)

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.

Project Description

The Lead Agency proposes demolition of the existing parking lot and restaurant land uses in order to construct a 33-story building that will include 428 multi-family residential units and approximately 7,200 square feet of commercial uses. Parking for 435 vehicles and 475 bicycles is provided in an 11-level enclosed structure with 2.5 levels underground. During construction, soil disturbance activities will require approximately 43,000 cubic yards of soil export. Construction and operational emission impacts were estimated using the California Emissions Estimator Model (CalEEMod). Construction is estimated start in 2016 and be completed in 2018.

Localized Operational Significance Thresholds Analysis

The Lead Agency has determined that project regional and on-site air quality impacts would result in less than significant impacts with mitigation during construction. The Lead Agency also determined that operational regional air quality impacts were less than significant but did not compare operational on-site emissions with the applicable operational localized significance thresholds in the Draft MND. Without quantifying these impacts, the Lead Agency has not demonstrated that the proposed project will not generate significant adverse operational air quality impacts to sensitive receptors located nearby.¹ Therefore, the SCAQMD staff recommends that the Lead Agency demonstrate

¹ Metro 417 Apartments adjacent to the project site (Figure II-7).

that project impacts are less than significant in the Final MND by including the on-site operational emission estimates along with the applicable thresholds of significance.

SCAQMD guidance for performing a localized air quality analysis can also be found at the SCAQMD website.² Should the Lead Agency conclude after its analyses that the localized operational air quality impacts exceed the SCAQMD daily significance thresholds, mitigation pursuant to Section 15126.4 of the CEQA Guidelines should be implemented, e.g.:

Compliance With SCAQMD Rule 1403 During Demolition/Renovation Activities

Besides estimating construction and operational air quality impacts, the Lead Agency should also describe compliance with SCAQMD Rule 1403 - Asbestos Emissions from Demolition/Renovation Activities due to the potential of discovering asbestos during the demolition activities described in the project description.

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.

Sincerely,

Jillian Wong

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² <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>