

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:

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darlene.navarrete@lacity.org jenna.monterrosa@lacity.org

Jenna Monterrosa, City Planner City of Los Angeles – Department of City Planning 200 N. Spring St., Room 750 Los Angeles, CA 90012

<u>Draft Mitigated Negative Declaration (MND) for the Proposed Project Located at</u> <u>1930 W. Wilshire Blvd., Los Angeles (ENV-2016-3144)</u>

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comment is meant as guidance for the Lead Agency and should be incorporated into the Final IS/MND.

In the project description, the Lead Agency proposes to renovate and remodel an existing medical office building into a hotel and construct a 41-story (531,887 sf) mixed use building with subterranean parking. The Lead Agency determined that regional and localized construction emissions were significant. However, by incorporating mitigation measures MM 3-1 (100% Tier 4 engines) and MM 3-2 (100% 2010 or newer haul trucks), the Lead Agency was able to reduce impacts to less than significant. In order avoid underestimating impacts in the Air Quality Analysis, the SCAQMD staff recommends revising MM 3-1 and MM 3-2 as follows:

MM 3-1: All off-road construction equipment greater than 50 hp shall meet U.S. EPA Tier 4 emission standards, where available, to reduce NOx, PM10, and PM2.5 emissions...

MM 3-2: Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export), and if the Lead Agency determines that 2010 model year or newer diesel trucks cannot be obtained, the Lead Agency shall require trucks that meet U.S. EPA 2007 model year NOx emissions requirements.

The SCAQMD staff is available to work with the Lead Agency to address these concerns and any other air quality questions that may arise. Please contact Jack Cheng, Air Quality Specialist at (909) 396-2448, if you have any questions regarding these comments. We look forward to reviewing and providing comments for the Final IS/MND associated with this project.

Sincerely,

Jillian Wong Ph D

Jillian Wong, Ph.D.
Planning and Rules Manager
Planning, Rule Development & Area Sources

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