South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

May 29, 2018

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<u>Mitigated Negative Declaration (MND) for the Proposed</u> Shrader Hotel Project (1600-1616 1/2 N. Schrader Blvd. & 6533 W. Selma Ave.) (ENV-2016-3751)

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.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to demolish a surface parking lot, rehabilitate an existing building with 12 dwelling units, and build an 83,605-square-foot hotel with 198 rooms and subterranean parking on 0.62 acres (Proposed Project). Construction is expected to take 18.5 months¹.

SCAQMD Rule 1403 - Asbestos Emissions from Demolition/Renovation Activities

Since the Proposed Project would include demolition activities, asbestos may be encountered. As such, SCAQMD staff recommends that the Lead Agency include a discussion to demonstrate compliance with SCAQMD Rule 1403² 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 the public who are interested in the Proposed Project.

SCAQMD staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact me at <u>lsun@aqmd.gov</u> if you have any questions regarding the enclosed comments.

Sincerely,

Lijin Sun

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

LS <u>LAC180503-04</u> Control Number

¹ MND. Page II-42.

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