



South Coast Air Quality Management District

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E-MAILED: JULY 27, 2010

July 27, 2010

Mr. Jae Kim
Expedited Processing Section
Department of City Planning
200 North Spring Street
Los Angeles, CA 90012

ENV-2009-4089 Mitigated Negative Declaration

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document. AQMD staff notes that it did not receive a copy of the Mitigated Negative Declaration (MND) for this project during the official comment period. As concerns were raised by the public to our agency after the commenting period closed, AQMD staff is submitting this letter now. The following comments are meant as guidance for the Lead Agency and should be considered prior to approving the project.

The MND states that air quality impacts will be less than significant after the incorporation of mitigation measures. These measures include standard best management practices during construction activities consistent with AQMD Rule 403, and installation of MERV 11 filters in the project's HVAC system. However, based on materials received by AQMD staff, the MND does not appear to contain any quantification of potential air quality impacts. Hence it is impossible to determine if air quality impacts are indeed less than significant with the incorporation of mitigation measures.

AQMD staff recommends that the Lead Agency provide quantification of the potential air quality impacts and the mitigation measures for this project, including analyzing how project emissions contribute to both regional and local pollution during construction and operation of the project.¹ The public has also expressed concern about high traffic volumes at the adjacent intersection of 3rd Street and Fairfax Avenue, and that this project will increase traffic and air quality impacts at this already busy intersection. The Lead Agency should also prepare a carbon monoxide hot spot assessment in order to quantitatively assess the significance of this impact.

AQMD staff is willing to work with the Lead Agency to ensure that project-related emissions are accurately identified, categorized, and evaluated. If you have any questions regarding this letter, please call Ian MacMillan, Program Supervisor, CEQA Section, at (909) 396-3244.

¹ AQMD recommended guidance can be found at <http://www.aqmd.gov/ceqa/hdbk.html>

Sincerely,

A handwritten signature in black ink that reads "Ian V. MacMillan". The signature is written in a cursive, slightly slanted style.

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

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