



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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**Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) for the
Proposed Mixed-Use Building Project Located at 401, 407, 411, 417 W. Pico
Boulevard and 1247, 1249, 1251 S. Grand Avenue in Los Angeles (ENV-2013-3922-
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 CEQA document.

In the project description, the lead agency proposes to demolish a one-story commercial building and surface parking lot. Then, a seven-story, 115-unit apartment building would be constructed that would include 4,610 square feet of commercial/retail uses plus two levels of subterranean parking for 101 vehicles and 131 bicycles. During construction, approximately 14,250 cubic yards of soil will be exported from the project site.

On page 28 in the Air Quality Section, the lead agency based its determination that project impacts are less than significant by using the screening tables in Chapter 6 of the SCAQMD's 1993 CEQA Air Quality Handbook (Handbook) but did not quantify project air quality impacts. The SCAQMD has not supported the use of the Handbook Land Use screening tables for a number of years because those screening tables were derived using now outdated mobile source emission factors and trip rates. As a result of relying solely on those tables, instead of quantifying air quality impacts, the lead agency has not demonstrated that the proposed project will not generate significant adverse construction or operational air quality impacts that may trigger further analysis pursuant to the California Environmental Quality Act. Therefore, the SCAQMD recommends that the lead agency demonstrate that project impacts are less than significant in the Final MND by estimating short- and long-term 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)

¹ <http://www.aqmd.gov/ceqa/models.html>

emissions. The lead agency can also estimate project emissions by following the calculation 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 measures³ in addition to the mitigation included in the Draft MND starting on page two of the Draft MND to be implemented if the air quality impacts are determined to be significant.

Finally, it is recommended that the lead agency evaluate localized air quality impacts since it is noted on pages 10 and 29 in the Draft MND and in an aerial map inspection, the proposed project is located within one-quarter mile of sensitive receptors (multi-family residential properties and the California Hospital Medical Center) northwest, southeast and south of the proposed project. Therefore, the SCAQMD 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.

Sincerely,



Edward A. Eckerle
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EE:GM

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² <http://www.aqmd.gov/ceqa/hdbk.html>

³ http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html

⁴ <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>