



# South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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**Draft Mitigated Negative Declaration (Draft MND) for the Proposed Three-Story Office Building and Service Center Located at 330 N. Fairfax Avenue in the Wilshire Area of the City of Los Angeles (ENV-2015-868)**

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.

### Project Description

In the project description, the Lead Agency proposes to demolish three buildings totaling 15,000 square feet and then construction of a three-story, 28,341 square foot office building and service center. In addition to the demolition and building construction, parking would be provided in a three-level subterranean parking structure. The amount of excavation and soil to be exported from the subterranean garage were not described in the Draft MND. The project start and opening year dates were also not included in the Draft MND.

### Air Quality Analyses

The Lead Agency has determined that project air quality impacts would result in less than significant impacts during construction and operations but did not quantify project air quality impacts for either short- or long-term activities. Without quantifying project 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)<sup>1</sup>. CalEEMod is a statewide land use emissions model that can quantify potential project criteria pollutant and greenhouse (GHG) emissions. The Lead Agency can also estimate project emissions by following the

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<sup>1</sup> <http://www.aqmd.gov/home/regulations/ceqa/air-quality-modeling>

calculation methodologies in Chapter 9 and the Appendix to Chapter 9 in the South Coast SCAQMD's CEQA Air Quality Handbook<sup>2</sup>.

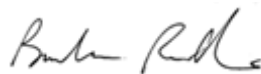
It is also recommended that the Lead Agency evaluate localized air quality impacts since it is noted in an aerial map inspection and alluded to in the environmental settings section on page three that the proposed project is located within one-quarter mile of sensitive receptors (residential properties) east of the project site. 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<sup>3</sup>. 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 measures<sup>4</sup> to be implemented if the air quality impacts are determined to be significant.

#### 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,



Barbara Radlein  
Program Supervisor  
Planning, Rule Development & Area Sources

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Control Number

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

<sup>3</sup> <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>

<sup>4</sup> <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>