



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Mitigated Negative Declaration (MND) for the 1000 S. Vermont Ave.; Wilshire (ENV-2016-3181)

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 MND.

SCAQMD Staff's Summary of Project Description

The Proposed Project consists of the demolition of an existing gasoline station, 8,942 square feet of medical office, and 32 apartment units. The Proposed Project would include the construction of a 271,242-square-foot building with 228 units and subterranean parking on 2.16 acres (Proposed Project).

Air Quality Analysis

In its air quality analysis, the Lead Agency quantified the Proposed Project's emissions using the URBEMIS2007 land use computer model¹. SCAQMD staff no longer recommends using URBEMIS2007 to estimate project air impacts. Instead, a more comprehensive land use model with updated mobile source emission rates the California Emissions Estimator model (CalEEMod)². CalEEMod uses the new EMFAC2014 and OFFROAD2011 emission factors rather than the outdated EMFAC2007 and OFFROAD2007 emission rates used in URBEMIS2007. In addition, CalEEMod provides updated methods and emission factors for non-vehicular sources. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. Therefore, SCAQMD staff recommends that the Lead Agency use the CalEEMod land use model to quantify the emissions in the Final MND.

Compliance with SCAQMD Rules

Based on a review of the project description, SCAQMD staff found that the Proposed Project would include demolition and removal of an existing gasoline station. The Final MND should include a discussion to demonstrate compliance with the requirements of SCAQMD Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities, SCAQMD Rule 1149 – Storage Tank and Pipeline Cleaning, and Degassing, and SCAQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil.

¹ Initial Study/Mitigated Negative Declaration. Page B-12.

² The California Emission Estimator Model (CalEEMod) land use model is accessible at: www.caleemod.com.

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.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS:JC

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