



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • [www.aqmd.gov](http://www.aqmd.gov)

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[Kinikia.gardner@lacity.org](mailto:Kinikia.gardner@lacity.org)  
[Darlene.navarrete@lacity.org](mailto:Darlene.navarrete@lacity.org)

Kinikia Gardner, Planning Assistant  
City of Los Angeles, City Hall  
Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

## **Draft Mitigated Negative Declaration (Draft MND) for the Proposed Convenience Store Located at 251 S. Lincoln Blvd.; Venice (ENV-2013-3815)**

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.

In the project description, the Lead Agency proposes to demolish two retail buildings totaling 1,304 square feet located on an existing gasoline station. In its replacement, a single 1,879 square foot convenience store will be constructed. Since the proposed project is located on an existing gasoline service station, SCAQMD staff is concerned about the potential air quality impacts from VOC contaminated soils encountered during grading and construction. Disturbing soils that may contain petroleum hydrocarbons are subject to the requirements of SCAQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil. Rule 1166 should be incorporated during the development of the Final MND.

The proposed project is also adjacent to sensitive land uses<sup>1</sup> (i.e., residential dwellings north and south of the project site); however, the Draft MND did not evaluate potential localized air quality impacts that could result from construction of the proposed project. Therefore, the SCAQMD staff recommends that the Lead Agency revise the air quality analysis to include an assessment of potential localized air quality impacts during construction of the proposed project. These potential air quality impacts should be assessed using SCAQMD's Localized Significance Methodology and compared to the localized significance thresholds specific to the project area<sup>2</sup>. Furthermore, the Lead Agency should ensure that all future projects include a localized air quality analysis if warranted. In the event that the Lead Agency determines the proposed project will result in significant localized construction air quality impacts, the SCAQMD staff recommends that the Lead Agency require mitigation to minimize these impacts to a less than significant level. Additional construction-related air quality mitigation measures are available at: [http://www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html)

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<sup>1</sup> California Air Resources Board. April 2005. "Air Quality and Land Use Handbook: A Community Health Perspective." Accessed at: <http://www.arb.ca.gov/ch/landuse.htm>

<sup>2</sup> The Localized Significance Threshold (LST) methodology and Mass Rate LST Look Up Table is available at: <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>

The 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. We look forward to reviewing and providing comments for the Final IS/MND associated with this project.

Sincerely,

*Jillian Wong*

Jillian Wong, Ph.D.  
Program Supervisor  
Planning, Rule Development & Area Sources

JW:JC  
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