



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 Five-Story, 59-Unit Residential Building With Subterranean Parking
Project Located at 350-362 S. Alexandria Avenue and 3671-3685 W. 4th Street in the
Wilshire Area in Los Angeles (MND-NG-15-098-PL; ENV-2014-3698)**

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 two existing multi-family residences totaling 11,873 square feet including export of approximately 8,500 cubic yards of soil. The project site is approximately 19,404 square feet in size encompassing four separate lots. After demolition, construction of a five-story, 52,630 square foot residential building with 59-units would begin along with excavation and construction of a two-level subterranean garage. The project's estimated construction start and completion dates were also not included in the draft CEQA document.

On page 14 in the Air Quality Section, the lead agency determined that project air quality impacts would be potentially significant without mitigation to nearby residences during construction activities but did not quantify project air quality impacts for short-term activities. Without quantifying project air quality impacts, the lead agency has not demonstrated that the proposed project will not generate significant adverse construction 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 construction 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) 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

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

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.

It is also recommended that the lead agency evaluate localized air quality impacts since it is noted on page nine of the Draft IS/MND and in an aerial map inspection, the proposed project is located within one-quarter mile of sensitive receptors (next to multi-family residential properties) adjacent to 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,

Jillian Wong

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JW:GM

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

³ <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>

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