



# South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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## **Review of the Mitigated Negative Declaration (MND) for the Proposed Retail Commercial Building Project Located at 801 S. Hoover St and 2700-2720 W. 8<sup>th</sup>, Wilshire Area of the City of Los Angeles (ENV-2015-4439)**

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.

According to the project description, the Lead Agency proposes to demolish an existing 1,846 square foot service station and auto repair building followed by the construction of a 3,060 square foot gas station and convenience store with 1,340 square feet of retail space. The existing fueling canopy, fuel dispensers and storage tanks will remain but a new fueling dispenser will be added to the existing system.

In the Draft MND, the Lead Agency has determined that project's air quality impacts are less than significant during construction and operation but did not quantify short- or long-term air quality emissions. 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 and mitigation pursuant to the California Environmental Quality Act (CEQA). Therefore, the SCAQMD staff 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 version of 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 gases (GHGs) 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<sup>2</sup>.

It is noted in an aerial map inspection that the proposed project is located within one-quarter mile of sensitive receptors (schools and multi-family residences) north, west and south of the project

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

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

site. Therefore, the SCAQMD staff recommends 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.

Based on the project description, asbestos may be encountered during demolition activities. Should that occur, the Lead agency should cite compliance with SCAQMD Rule 1403 -- Asbestos Emissions from Demolition/Renovation Activities in the Final MND. In addition, soil that is contaminated with hydrocarbons made be encountered during soil disturbance activities. Should this occur, the Final MND should also describe compliance with SCAQMD 1166- Volatile Organic Compound Emissions from Decontamination of Soil.

Since the proposed project includes new gasoline dispensing equipment, the Lead Agency should list SCAQMD as a CEQA responsible agency and describe compliance with SCAQMD Rule 461 - Gasoline Transfer and Dispensing in the Final CEQA document. Additionally, the Final MND should include a Health Risk Assessment (HRA) to estimate the health risks from the toxic air contaminants emitted from the gasoline dispensing station. Questions concerning SCAQMD permits for the new dispensing equipment can be directed to SCAQMD Engineering and Compliance staff at (909) 396-2551.

Pursuant to Public Resources Code Section 21092.5, SCAQMD staff requests that the Lead Agency provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the final CEQA document. Further, staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Sam Wang, Air Quality Specialist – CEQA Section, at (909) 396-2649, if you have any questions regarding these comments.

Sincerely,

*Jillian Wong*

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

Attachment

JW:GM:SW  
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<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>