



South Coast Air Quality Management District

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Mitigated Negative Declaration (MND) for the James M Wood Blvd., & Georgia St; Central City Project (ENV-2016-4204)

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.

In the project description, the Lead Agency proposes to construct a 247 room hotel with a sit down restaurant. In the air quality analysis, the Lead Agency found that regional and localized construction and operational emissions would be less than significant. In the MND, no mitigation measures were deemed necessary. Emissions calculations found on Table 4.3-1 Maximum Construction Emissions of the MND are consistent with mitigated construction emissions calculated in Appendix ENV-2016-4204-A (Air Quality and Greenhouse Gas Emissions Technical Report). The SCAQMD staff found that Tier 4 construction equipment was used to calculate the mitigated construction emissions from NO_x, PM₁₀, and PM_{2.5} as substantial evidence to support the Lead Agency's finding.

In order to maintain consistency, the Lead Agency should incorporate mitigation measures consistent with the Air Quality Technical Report. The SCAQMD staff recommends that the Lead Agency commit itself to using Tier 4 for all off-road construction equipment greater than 50 hp and include the following mitigation measure:

Mitigation Measure: All off-road construction equipment greater than 50 hp shall meet U.S. EPA Tier 4 emission standards to reduce NO_x, PM₁₀, and PM_{2.5} emissions at the project site.

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.

Sincerely,

Lijin Sun

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