



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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**Draft Environmental Impact Report (EIR) for the Proposed
East End Studios ADLA Project (Proposed Project)
(SCH No.: 2023020196)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The City of Los Angeles is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff (Staff) has provided a brief summary of the project information and prepared the following comments organized by topic of concern.

South Coast AQMD Staff's Summary of Project Information in the Draft EIR

Based on the Draft EIR, the Proposed Project will develop a multi-story production studio campus totaling 657,611 square feet (sq. ft) on an approximately 14.6-acre site.¹ The Proposed Project would include²:

- 299,012 sq. ft of studio uses with five buildings,
- 69,192 sq. ft of production support space,
- 307,407 sq. ft of office use,
- Up to 8,000 sq. ft can be used as retail space,
- Up to 4,000 sq. ft of restaurant space,
- Demolition of two existing warehouses totaling approximately 311,000 sq. ft

The Proposed Project is located at 1206-1338 East 6th Street, 1205-1321 Wholesale Street, 1210-1361 Produce Street, 635 and 639 Mill Street, and 640 South Alameda Street.³ Based on the aerial photograph, Staff found that the nearest sensitive receptor (e.g., elementary school) is less than 500 feet south of the Proposed Project. The construction is anticipated to begin in 2024 and be completed in 2026.⁴

¹ Draft EIR. Page II-1.

² Ibid.

³ Ibid.

⁴ Ibid. Page II-20.

South Coast AQMD Staff's Comments on the Draft EIR*South Coast AQMD Air Permits and Role as a Responsible Agency*

Based on the Draft EIR, the Proposed Project would include standby diesel generators and spray booths.⁵ Thus, air permits from South Coast AQMD will be required, and the role of South Coast AQMD would change from a Commenting Agency to a Responsible Agency under CEQA. In addition, if South Coast AQMD is identified as a Responsible Agency, per CEQA Guidelines Sections 15086, the Lead Agency is required to consult with South Coast AQMD. CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of evaluating the applications for air permits. For these reasons, the Final EIR should include a discussion about any new stationary and portable equipment requiring South Coast AQMD air permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project.

The Final EIR should also include calculations and analyses for construction and operation emissions for the new stationary and portable sources, as this information will also be relied upon as the basis for the permit conditions and emission limits for the air permit(s). Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions regarding what types of equipment would require air permits. For more general information on permits, please visit South Coast AQMD's webpage at: <http://www.aqmd.gov/home/permits>.

Conclusion

As set forth in California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a-b), the Lead Agency shall evaluate comments from public agencies on the environmental issues and prepare a written response at least 10 days prior to certifying the Final EIR. As such, please provide South Coast AQMD written responses to all comments contained herein at least 10 days prior to the certification of the Final EIR. In addition, as provided by CEQA Guidelines Section 15088(c), if the Lead Agency's position is at variance with recommendations provided in this comment letter, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided.

Thank you for the opportunity to provide comments. South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Danica Nguyen, Air Quality Specialist, at dnguyen1@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

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SW:DN

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⁵ Ibid.