



# South Coast Air Quality Management District

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

SENT VIA E-MAIL AND USPS:  
[monique.acosata@lacity.org](mailto:monique.acosata@lacity.org)

December 3, 2014

Ms. Monique Acosta, City Planning Associate  
City of Los Angeles, City Hall  
Department of City Planning  
200 N. Spring Street, Room 750  
Los Angeles, CA 90012

**Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) for the Proposed Mixed-Use Commercial and Residential Building Located at 211, 215, 217, 221, 223, 225, 227, 231, 233, 235, 237, 239, 241 N. Vermont Ave., ; Wilshire (ENV-2014-1948)**

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 IS/MND.

The Lead Agency proposes to demolish two commercial buildings and construct a 4-story 137,201 sq. ft. mixed-use commercial and residential building. Since the project includes demolition, the Lead Agency must comply with SCAQMD Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities. Please provide additional information regarding compliance with SCAQMD Rule 1403 in the Final IS/MND.

The proposed project is also adjacent to sensitive land uses<sup>1</sup> (i.e., residential to the west, schools to the south, and east 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)

---

<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 Baker*

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

JB:JC

LAC 1411200-13  
Control Number