



South Coast Air Quality Management District

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City of Los Angeles, City Hall
Department of City Planning
200 N. Spring Street, Room 750
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**Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) for the Proposed Office Building Project
Located at 1550 West 8th St., in Los Angeles (ENV-2014-2001-CE)**

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 a two-story office building and surface parking lot. A four-story 45,770 sqft commercial office building is to be constructed on the site. Of the 45,770 sqft building, 34,280 sqft will be occupied by commercial office space and 11,440 sqft would be covered ground level parking with 33 vehicle spaces.

Based on a review of the Draft IS/MND, the SCAQMD staff is concerned about the potential air quality impacts from VOC contaminated soils. In the Review of Historical Site Use section on page 3-53, the Lead Agency determined that the site was formally occupied by a gas station from 1933 to approximately the mid-1950s and requires additional investigation outside the scope of a Phase I Environmental Site Assessment (Phase I ESA). The Phase I ESA Report prepared by CTI Environmental, Inc. (April 29, 2014) was not available for further review and comment. Disturbing soils that may contain petroleum hydrocarbons are subject to the requirements of SCAQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil. Rule 1166 should be incorporated during the development of the Final IS/MND. Furthermore, the Final IS/MND should discuss how the project will comply with SCAQMD Rule 402 – Public Nuisance and SCAQMD Rule 403 – Fugitive Dust Rule, if volatile organic compounds and/or odors are emitted during soil disturbance activities.

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

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JB:JC

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