



# South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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**Draft Mitigated Negative Declaration (MND) for the Proposed 24-Story, Mixed-Use Development Located at 1229-1241 S. Grand Avenue in the Central City Portion of the City of Los Angeles (ENV-2016-190)**

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.

### Project Description

The Lead Agency proposes to develop 24-story mixed use office and retail tower building that will include 161-condominium residential units and approximately 2,100 square feet of commercial space. In addition, parking will be provided within the proposed tower in six-levels of parking within the proposed tower building, with two levels of parking below-grade. The proposed project will also require approximately 30,000 cubic yards of soil export from the excavation of the subterranean garage. The land current use at the project site is paved surface parking lot. The air quality assumption details including the amount of demolition debris for the surface parking lot materials and soil export haul trips, vehicle miles traveled to the demolition debris and soil disposal site(s) were not included in the DMND. The approximate project start date, phasing and project completion date were also not included in the DMND.

### Air Quality Analyses

The Lead Agency has determined that project air quality impacts would result in less than significant impacts during construction and operation activities 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 additional mitigation pursuant to the California Environmental Quality Act. 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 California Emission Estimator Model (CalEEMod)<sup>1</sup>. CalEEMod is a statewide land use

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

emissions model that can quantify potential project criteria pollutant and greenhouse (GHG) 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 and in the environmental settings section on page six that the proposed project is located within one-quarter mile of sensitive receptors: a 600 unit residential building directly across Grand Avenue and a 115-unit building south of the project site, both currently under construction and either project could open while the proposed 24-story building is under construction. 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, SCAQMD staff has compiled mitigation measures<sup>4</sup> to be implemented, in addition to the measures listed starting on page two in the DMND, if the air quality impacts are determined to be significant.

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final MND. The SCAQMD staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

*Jillian Wong*

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

<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>