



# South Coast Air Quality Management District

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City of Los Angeles, City Hall  
Department of City Planning  
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**Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) for the  
Proposed Restoration and Conversion of an Existing Warehouse Project Located at  
841 E. 4<sup>th</sup> Place in the Central City North Area (ENV-2014-2443-MND)**

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.

### Project Description

In the project description, the lead agency proposes to restore and convert an existing warehouse building into 78,600 s.f. of office use, 25,000 s.f. of retail, and 20,000 s.f. of restaurant uses, which will result in a net increase of over 1,000 daily trips.

### Air Quality Analyses

The Lead Agency has determined that project air quality impacts would be potentially significant without mitigation during construction and operations but did not quantify project air quality impacts for either short- or long-term activities. 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 pursuant to the California Environmental Quality Act. Therefore, the SCAQMD 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 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> Should the lead agency conclude after its analyses that construction

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

<sup>2</sup> <http://www.aqmd.gov/ceqa/hdbk.html>

or operational air quality impacts exceed the SCAQMD daily significance thresholds, staff has compiled mitigation measures<sup>3</sup> in addition to the mitigation included in the Draft MND starting on page two of the Draft MND to be implemented if the air quality impacts are determined to be significant.

Compliance With SCAQMD Rules and Permit Requirements

Besides estimating construction and operational air quality impacts, the Lead Agency should describe compliance with SCAQMD rules and regulations in the Final MND including, but not limited to, Rule 402 – Nuisance; Rule 403 – Fugitive Dust; and Rule 1403 - Asbestos Emissions from Demolition/Renovation Activities.

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. If you have any questions regarding this letter, please contact me at [jbaker@aqmd.gov](mailto:jbaker@aqmd.gov) or call me at (909) 396-3176.

Sincerely,

*Jillian Baker*

Jillian Baker, Ph.D.

Program Supervisor

Planning, Rule Development & Area Sources

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<sup>3</sup> <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>