



# South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Department of City Planning  
200 N. Spring Street, Room 750  
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**Draft Mitigated Negative Declaration (DMND) for the Proposed 107,813 Square Foot  
Mixed-Use Project Located at 6118 W. Pico Boulevard in the Wilshire Area  
(ENV-2014-4818-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.

The proposed project includes demolition of an approximately 11,538 square foot commercial building followed by construction of an 107,813 square foot, six-story, mixed-use development project. The proposed project will include 100 residential units and approximately 16,600 square feet of commercial space on an approximately 0.83-acre site. In addition, parking would be provided for approximately 245 parking spaces in two-levels of subterranean parking. The proposed project estimates approximately 28,060 cubic yards of soil export from soil disturbance activities. Currently, the site is developed as a surface parking lot and the surrounding land uses include multi-family residences.

In the Air Quality Section starting on page 21, the Lead Agency refers to construction and operational emissions estimates<sup>1</sup>. The DMND includes the SCAQMD regional operational thresholds but does not include the construction thresholds. The DMND further includes the Lead Agency's determination that construction emission impacts are less than significant with mitigation but did not include the actual unmitigated and mitigated estimates in the DMND. Operational impacts were also discussed and the SCAQMD operational thresholds were included in the narrative but the actual estimates were not included in the DMND. The SCAQMD staff therefore recommends that the Lead Agency update the Air Quality Analysis to substantiate the significance findings in the DMND by including, at a minimum, summary information of the emission estimates in the Final MND. The summary information should include the unmitigated and mitigated regional estimates compared with the applicable thresholds of significance. Further, the estimated project construction start and completion dates along with the phasing schedule should also be included. This supporting information can be included in the narration, in tables or as part of an appendix. Otherwise, the Lead Agency has not included the substantial evidence needed to support its findings.

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<sup>1</sup> DMND, Page 20, Section III (b), CalEEMod Tables 2.1 (Construction) and Table 2.2 (Operations).

Ms. Gabriela Juarez,  
City Planning Associate

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The SCAQMD staff is also concerned that localized air quality impacts were not analyzed in the DMND since sensitive receptors are located within one-quarter mile of the project site (multi-family residences located just south of the project site<sup>2</sup>). The SCAQMD staff therefore recommends that the Lead Agency include an assessment of potential localized air quality impacts. 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>3</sup>. 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. Additional construction-related air quality mitigation measures are available at the SCAQMD website in addition to the measures included in the DMND starting on page two of the DMND.<sup>4</sup>

Please provide the SCAQMD staff 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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JW:GM

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<sup>2</sup> DMND, Section III (d) Air Quality, Page 23.

<sup>3</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> .

<sup>4</sup> Mitigation Measures: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>