



# South Coast Air Quality Management District

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

SENT VIA E-MAIL AND USPS:

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[amiller@beverlyhills.org](mailto:amiller@beverlyhills.org)

Alek Miller, Associate Planner  
City of Beverly Hills  
Community Development Department  
455 North Rexford Drive, First Floor  
Beverly Hills, California 90210

## **Draft Environmental Impact Report (EIR) for the Proposed 100 North Crescent Drive Beverly Hills Media Center Project**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comment is meant as guidance for the Lead Agency and should be incorporated into the Final EIR.

### SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to renovate the existing three-story, 106,085-square-foot office building and add two additional stories totaling 55,070 square feet of floor area to the office building on 1.34 acres (Proposed Project). The Proposed Project is a mix of commercial, retail, and residential uses. Based on a review of aerial photographs, the Proposed Project is located immediately south of existing residential uses. "The nearest existing sensitive receptors are residential uses to the north, approximately 25 feet, or 7.6 meters, from the proposed project site boundary."<sup>1</sup> Construction is expected to last 23 months.

### Air Quality Analysis – Localized Significance Thresholds (LSTs)

As stated above, the Proposed Project is located immediately south of existing sensitive land uses. Although the Lead Agency discussed SCAQMD LSTs methodology and the LST mass rate look-up table in the Draft EIR<sup>2</sup>, the Lead Agency did not quantify the potential localized air quality impacts that could result from the construction or operation of the proposed project. There is no substantial evidence to support this statement, "construction of the proposed project would generate short-term air pollutant emissions that would be below the SCAQMD and LST thresholds," on Page 104 of the Draft EIR, or the proposed project would have no adverse effects on air quality. Therefore, SCAQMD staff recommends that the Lead Agency revise the air quality analysis to include a quantitative assessment of potential localized air quality impacts during the construction and operation of the Proposed Project in the Final EIR to support the impact conclusions.

SCAQMD staff recommends calculating localized air quality impacts and comparing the results to SCAQMD's CEQA localized significance thresholds specific to the project area<sup>3</sup>. Guidance for performing a localized air quality analysis is available on SCAQMD website<sup>4</sup>. In the event that the Lead Agency finds, after revising the air quality analysis, that the Proposed Project

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<sup>1</sup> Draft EIR. Air Quality. Page 101.

<sup>2</sup> *Ibid.* Pages 101-104.

<sup>3</sup> South Coast Air Quality Management District. The Localized Significance Threshold (LST) methodology and Mass Rate LST Look Up Table. Accessed at: <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>.

<sup>4</sup> *Ibid.*

would result in significant adverse localized construction impacts, SCAQMD staff recommends that the Lead Agency require mitigation measures in accordance with CEQA Guidelines Section 15126.4(a). For more information on suggested possible construction-related air quality mitigation measures as guidance to the Lead Agency, please visit SCAQMD's CEQA Air Quality Handbook website<sup>5</sup>.

Pursuant to Public Resources Code Section 21092.5 and CEQA Guidelines Section 15088, SCAQMD staff requests that the Lead Agency provide SCAQMD with written responses to all comments contained herein prior to the certification of the Final EIR. SCAQMD staff is available to work with the Lead Agency to address any questions that may arise from this comment letter. Please contact me at [lsun@aqmd.gov](mailto:lsun@aqmd.gov) if you have any questions.

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

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<sup>5</sup> South Coast Air Quality Management District. CEQA. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.