



# South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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## **Mitigated Negative Declaration (MND) for the 1370, 1374, 1410 & 1416-1418 S. Flower St; Central City Project (ENV-2016-2477)**

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 MND.

### Project Description

The proposed project consists of the demolition of the existing structures and the construction of a seven-story, mixed-use residential building with 147 units, restaurant space, and retail uses. The proposed project also includes the construction of subterranean parking – two levels of parking below grade.

### Air Quality Analysis

In the air quality analysis, the Lead Agency found that regional and localized construction emissions would be less than significant. Based on a review of Table IV-2 and Table IV-5 on Page IV-12 and Page IV-15, respectively, in the MND, the SCAQMD staff found that the construction emission calculations assumed compliance with SCAQMD Rule 403 – Fugitive Dust. To be consistent with the calculations assumption, the Lead Agency should discuss and provide additional information to demonstrate compliance with SCAQMD Rule 403 in the Final MND. Also in the air quality analysis on Page IV-11 in the MND, the CalEEMod Version 2013.2.2 was used to calculate emissions. The most recent version of the CalEEMod (Version 2016.3.1) is available free of charge on the SCAQMD website, at <http://www.caleemod.com/>. Therefore, the SCAQMD staff recommends that the Lead Agency revise the emission calculations by using the CalEEMod Version 2016.3.1.

### Compliance with SCAQMD Rules

Based on a review of the project description, the SCAQMD staff found that the proposed project would include demolition. Therefore, the Lead Agency should discuss and provide additional information to demonstrate compliance with SCAQMD Rule 1403 – Asbestos Emissions from Demolition/Renovation in the Final MND. Additionally, as shown in Table IV-9 of Section 8, Hazards and Hazardous Materials, on Page IV-37 in the MND, historic project site uses include, but are not limited to, gas station, auto repair, and auto parts retail/repair. In the event that petroleum hydrocarbons are expected to be encountered during excavation and any other soil disturbing activities, the Final MND should include a discussion of compliance with the requirements of SCAQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil.

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.

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.

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Planning, Rule Development & Area Sources

LS:JC

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