



# South Coast Air Quality Management District

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SENT VIA USPS AND E-MAIL:

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## **Mitigated Negative Declaration (MND) for the Proposed 668 S Coronado St; Westlake (ENV-2016-3755)**

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 demolish the existing parking lot and construct a 90,000 square-foot mixed use building consisting of 122 residential units, commercial space, and a subterranean parking lot (Proposed Project). A total of 21,940 cubic yards of soil will be exported<sup>1</sup>. The Proposed Project is bounded by commercial uses to the north, east, south, and west.

### Air Quality Analysis

In the Air Quality Section, the Lead Agency quantified the Proposed Project's construction and operational emissions and compared them to SCAQMD's regional and localized air quality CEQA significance thresholds. The Lead Agency found that the Proposed Project's regional and localized construction and operational emissions would be less than significant. The Air Quality Impact Study (AQIS) states that approximately 15,000 cubic yards of soil is anticipated to be excavated for export during grading<sup>2</sup>. The amount of soil export analyzed in the AQIS is inconsistent and may have led to an under-estimation of emissions. Therefore, SCAQMD staff recommends revising the air quality analysis based on 21,940 cubic yards of soil export consistent throughout the Final MND and AQIS.

Pursuant to the CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process. Please provide SCAQMD staff with written responses to all comments contained herein prior to the adoption of the Final MND. Please contact Jack Cheng, Air Quality Specialist – CEQA IGR Section, at (909) 396-2448, if you have any questions regarding these comments.

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS:JC

LAC170810-04

Control Number

<sup>1</sup> Mitigated Negative Declaration. *ENV02016-3755-MND*. Page 1

<sup>2</sup> Mitigated Negative Declaration. *Air Quality Impact Study*. January 2017. Page 1.