



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 Proposed Project Located at
640 S St. Andres Pl; Wilshire (ENV-2016-1496)**

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.

SCAQMD staff recommends including the use of Tier 3 construction equipment for all off-road construction equipment as a mitigation measure in order to be consistent with the air quality modeling assumption. The proposed project consists of the demolition of an existing parking lot and the construction of a 196-unit, high rise residential building with subterranean parking. In the air quality analysis, the Lead Agency found that the localized PM10 and PM2.5 construction emissions would be significant. Based on a review of the CalEEMod modeling output in ENV-2016-1496-B, SCAQMD staff found that Tier 3 for all construction equipment was used to calculate PM10 and PM2.5 construction emissions as substantial evidence to support the finding that localized construction emissions from PM10 and PM2.5 would not exceed the SCAQMD's localized standards of significance. However, the use of Tier 3 construction equipment was not included as a mitigation measure. To ensure that localized air quality impacts from PM10 and PM2.5 during construction are adequately mitigated, and to be consistent with the air quality modeling assumption, SCAQMD staff recommends the Lead Agency revise the MM AQ-1 as follows.

MM AQ-1: All off-road construction equipment greater than 50 hp shall meet U.S. EPA Tier 3 emission standards.

SCAQMD staff is available to work with the Lead Agency to address any other air quality questions that may arise. Please contact Jack Cheng, Air Quality Specialist, CEQA IGR, at (909) 396-2448, if you have any questions regarding these comments.

Sincerely,

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JW:LS:JC
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