



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Negative Declaration (MND) for the Proposed Env-2018-3115 Project

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.

SCAQMD Staff's Summary of Project Description

The lead agency proposes the demolition of 21,160 square-feet (sq. ft.) of industrial/warehouse buildings and the construction of a 151,487 sq. ft. 3-story self-storage building and parking lot on 2.53-acres (proposed project). The proposed project is located at 4794 East Valley Boulevard, in the Northeast Los Angeles Community Plan area. Construction of the proposed project is expected to occur over a 15 month time period.¹

SCAQMD Staff's Summary of Air Quality Analysis

In the air quality analysis, the lead agency quantified the proposed project's construction and operational air quality impacts and compared those impacts to SCAQMD's regional and localized air quality CEQA significance thresholds. Since the proposed project includes demolition, SCAQMD staff recommends the lead agency include a discussion regarding SCAQMD Rules 1403 and 403. More detailed information on SCAQMD rule compliance is provided below

SCAQMD Rule Compliance

Regarding demolitions, SCAQMD Rules 1403 and 403 apply. Rule 1403, Asbestos Emissions from Demolition /Renovation Activities, requires a thorough asbestos survey performed by a licensed Certified Asbestos Consultant (CAC) before demolition or renovation, and asbestos containing materials (ACM) be removed, handled, packaged, labeled and disposed of by a licensed asbestos abatement contractor. The rule specifies removal methods. Rule 403, Fugitive Dust, applies to demolitions also to prevent fugitive dust from crossing the property lines. Dust suppression is mainly achieved by the application of water and prevention of runoff that may dry and generate fugitive dust.

Conclusion

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the final CEQA Document. The SCAQMD staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Robert Dalbeck, Assistant Air Quality Specialist, at rdalbeck@aqmd.gov, if you have any questions regarding these comments.

¹ ND. Section 4, *Environmental Impact Analysis*, Page 4-18

Sincerely,

Daniel Garcia

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Program Supervisor

Planning, Rule Development & Area Sources

DG/RD

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