



South Coast
Air Quality Management District

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FAXED: February 12, 2010

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Mr. W. Ono Ujor, City Planner
Community Redevelopment Agency
City of Los Angeles
354 South Spring Street, Suite 700
Los Angeles, CA 90013

**Review of the Initial Study and Negative Declaration (IS/ND) for the
Highland Center of Demolition of Buildings Project**

The South Coast Air Quality Management District (SCAQMD) 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 revised or final CEQA document as appropriate.

The lead agency failed to quantify criteria pollutant emissions during construction and greenhouse gas emissions. Without quantifying air quality impacts from the project, the lead agency is unable to support its conclusions for air quality impacts. Given that the project potentially includes a substantial amount of construction activities a fair argument can be made that the proposed project may potentially generate significant adverse air quality impacts. Therefore, SCAQMD staff requests that the lead agency quantify potentially significant adverse construction air quality impacts and revise the CEQA document as appropriate. Staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,

A handwritten signature in black ink that reads "Ian V. MacMillan".

Ian MacMillan
Program Supervisor, CEQA Inter-Governmental Review
Planning, Rule Development & Area Sources

Attachment

IM:DG

LAC100126-05
Control Number

Air Quality Analysis:

Quantification of Regional Construction Emissions

1. The lead agency did not quantify potentially significant adverse regional construction air quality impacts from the proposed project. On page 12 of the IS/ND the lead agency finds that all air quality impacts from the project are less than significant, however, the lead agency does not substantiate its findings that the proposed project will have no adverse air quality impacts. To adequately evaluate the project's air quality impacts, it is necessary to quantify construction (i.e. demolition) emissions and compare them to applicable significance thresholds. Since the lead agency failed to quantify construction related air quality impacts they have not demonstrated that air quality impacts from the proposed project are insignificant.

SCAQMD staff requests that the lead agency identify all potential adverse air quality impacts that could occur from all phases of the project and all air pollutant sources related to the project in the revised or final CEQA document. Specifically, SCAQMD staff recommends the lead agency calculate air quality impacts from construction activities. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings used for striping traffic lanes or any associated structures, off-road equipment and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips).

The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The SCAQMD recommends that the lead agency use this Handbook as guidance when preparing its revised air quality analysis. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720. Additionally, the lead agency may be able to use the URBEMIS 2007 Model. This model is available on the SCAQMD Website at: www.aqmd.gov/ceqa/models.htm.

Quantification of Regional and Localized PM2.5 Emissions

2. As part of the analysis recommended in comment #1 above, SCAQMD staff also recommends analyzing PM2.5 emissions. The SCAQMD has developed a methodology for calculating PM2.5 emissions from construction activities. In connection with developing PM2.5 calculation methodologies, the SCAQMD has also developed both regional and localized significance thresholds. The SCAQMD staff requests that the lead agency quantify PM2.5 emissions and compare the results to the recommended PM2.5 significance thresholds. Guidance for calculating PM2.5 emissions and PM2.5 significance thresholds can be found at the following internet address: http://www.aqmd.gov/ceqa/handbook/PM2_5/PM2_5.htm.

Localized Construction Emission Impacts

3. On page six of the IS/ND the lead agency indicates that sensitive receptors (i.e., Hollywood High School, apartment complex, and a multi-family residential building) surround the project site. Therefore, in addition to analyzing regional air quality impacts (see comments #1 and #2) the SCAQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LSTs can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. The unsubstantiated findings on page 12 of the IS/ND made by the lead agency are insufficient for evaluating localized air quality impacts, therefore, the SCAQMD staff requests that the lead agency quantify localized impacts by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/ceqa/handbook/LST/LST.htm>.

Quantification of Greenhouse Gas (GHG) Emissions

4. The Office of Planning and Research in its Technical Advisory (2008) specifically recommends analyzing GHG impacts from a project and making a determination of significance. Similarly, the California Attorney General's Office has entered into a number of lawsuits and settlements with lead agencies because they failed to analyze greenhouse gas emissions, failed to make a determination of significance (absence of a significance threshold does not relieve the lead agency of the obligation to make a significance determination) and/or providing sufficient greenhouse gas mitigation measures. Therefore, SCAQMD staff requests that the revised SEQA document include a quantitative analysis of greenhouse gases, a determination of significance, and, if necessary, feasible mitigation measures.

Regulatory and Mitigation Measures

Regional and Localized Construction Mitigation Measures

5. In the event that the lead agency's CEQA Document requested in comment #1 demonstrates that any criteria pollutant emissions from the regional and/or localized construction emissions analysis create significant adverse impacts the SCAQMD recommends that the lead agency require mitigation pursuant to CEQA Guidelines §15370, which could minimize or eliminate significant adverse air quality impacts. To assist the lead agency with identifying possible mitigation measures for the project, please refer to Chapter 11 of the SCAQMD CEQA Air Quality Handbook for sample air quality mitigation measures. A list of mitigation measures can be found on the SCAQMD's CEQA webpage at the following internet address: www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.htm

Additionally, SCAQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook contain numerous measures for controlling construction-related emissions that should be considered for use as CEQA mitigation if not otherwise required.

Applicable Regulatory Measures

6. As a reminder, the SCAQMD staff recommends that the lead agency ensure project compliance with SCAQMD Rule 1403 (Asbestos Emissions from Demolition/Renovation Activities) to be addressed in the final CEQA document.