



South Coast Air Quality Management District

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Review of the Draft Environmental Impact Report (Draft EIR) for the Proposed Granada Hills-Knollwood/ Sylmar Community Plan Update Project

The South Coast Air Quality Management District (AQMD) 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 Environmental Impact Report (Final EIR) as appropriate.

The AQMD staff is concerned that the lead agency has not demonstrated that the proposed project will have less than significant operational air quality impacts given that the project could place new sensitive land uses¹ within 500 feet of the 210 Freeway. The 210 Freeway is a potentially significant source of toxic air pollutants due to the approximate 100,000 vehicles per day that currently travel along this section. Therefore, consistent with the CARB Land Use Handbook² the lead agency should include mitigation in the Final EIR that precludes the placement of new sensitive land uses or the intensification of existing sensitive land uses within 500 feet of the 210 Freeway. If the lead agency determines that a mitigation measure requiring a 500 foot buffer between the 210 Freeway and sensitive land uses is infeasible then the potential health risk impacts to these receptors should be quantified prior to any specific project approval. In the event that the Final EIR demonstrates significant adverse air quality impacts, the lead agency should require mitigation pursuant to Section 15092 of the California Environmental Quality Act (CEQA) Guidelines.

¹ Sensitive land uses are land uses where sensitive individuals are most likely to spend time, including schools, schoolyards, parks, playgrounds, day care centers, nursing homes, hospitals, and residential communities.

² California Air Resources Board. April 2005. "Air Quality and Land Use Handbook: A Community Health Perspective." Accessed at: <http://www.arb.ca.gov/ch/landuse.htm>

Further, the AQMD staff recommends that the lead agency ensure that the Draft EIR disclose the project's maximum daily operational air quality impacts by quantifying potential operational emissions for interim years. Also, the AQMD staff recommends that pursuant to Section 15126.4 of the CEQA Guidelines additional mitigation measures are considered to minimize the project's significant construction-related air quality impacts and greenhouse gas (GHG) impacts. Details regarding these comments are attached to this letter.

AQMD 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,



Ian MacMillan

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

Attachment

IM:DG

LAC121011-05
Control Number

Potential Health Risk Impacts to Sensitive Land Uses

1. Based on the lead agency's discussion regarding toxic air contaminants (Section 4.2) in the draft EIR the proposed project includes potential development of sensitive land uses within 500 feet of the 210 Freeway. As a result, the AQMD staff is concerned about the potential health risk impacts from toxic air pollutants emitted by the significant volume of traffic that would travel in close proximity to these land uses.

The lead agency relies on Mitigation Measure 4.2-3 (MM 4.2-3) to mitigate the project's health risk impacts from the 210 Freeway below the significance level. MM 4.2-3 is vague and does not appear sufficient to effectively reduce potential TAC's from the 210 Freeway. Specifically, MM 4.2-3 requires that projects "...achieve an acceptable interior air quality level for sensitive receptors..." by incorporating appropriate measures into discretionary project building design. However, without quantifying the level of potential air quality impacts from the freeway, nor the effectiveness of the proposed mitigation measures, the lead agency has not demonstrated that this impact is less than significant. Therefore, AQMD staff recommends that the lead agency maintain the 500-foot buffer specified in the CARB Land Use Handbook for any new residential project built close to a freeway absent any publicly reviewable, quantified demonstration of its impacts.

Peak Daily Operational Emissions

2. In Table 4.2-11 of the Draft EIR the lead agency presents the project's peak daily operational emissions from the project, however, it is not clear that the Draft EIR captures the project's potential maximum daily air quality impacts. For example, Table 4.2-11 demonstrates operational emissions impacts at plan build-out (2030), but the table does not demonstrate potential air quality impacts during interim years that could yield potentially significant impacts. Specifically, interim operational years could yield higher emissions impacts than 2030 given that they do not capture the full emissions benefits from implementation of the recently promulgated Clean Car Standards (Pavley), and Low Carbon Fuel Standards (LCFS), and diesel regulations. Therefore, the lead agency should ensure that the Draft EIR discloses the project's maximum daily operational air quality impacts by quantifying operational emissions for interim years such as 2015 and 2023.

Mitigation Measures for Construction Air Quality Impacts

3. Given that the lead agency concluded that the proposed project will have significant construction-related air quality impacts the AQMD staff recommends that the lead agency provide additional mitigation pursuant to CEQA Guidelines Section 15126.4. Specifically, AQMD staff recommends that the lead agency minimize or eliminate significant adverse air quality impacts by including the following additional measures in MM4.2-1 of the Draft EIR as follows:

- a) Provide temporary traffic controls such as a flag person, during all phases of significant construction activity to maintain smooth traffic flow,
- b) Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site,
- c) Reroute construction trucks away from congested streets or sensitive receptor areas,
- d) Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation,
- e) Improve traffic flow by signal synchronization, and ensure that all vehicles and equipment will be properly tuned and maintained according to manufacturers' specifications,
- f) Use coatings and solvents with a VOC content lower than that required under AQMD Rule 1113,
- g) Construct or build with materials that do not require painting,
- h) Require the use of pre-painted construction materials,
- i) Prohibit truck idling in excess of five minutes,
- j) Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export) and if the lead agency determines that 2010 model year or newer diesel trucks cannot be obtained the lead agency shall use trucks that meet EPA 2007 model year NOx emissions requirements.
- k) Consistent with measures that other lead agencies in the region (including Port of Los Angeles, Port of Long Beach, and Metro)³ have enacted, require all on-site construction equipment to meet EPA Tier 3 or higher emissions standards according to the following:
 - ✓ Prior to December 31, 2014: All offroad diesel-powered construction equipment greater than 50 hp shall meet Tier 3 offroad emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
 - ✓ Post-January 1, 2015: All offroad diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

³ For example see the Metro Green Construction Policy at:
http://www.metro.net/projects_studies/sustainability/images/Green_Construction_Policy.pdf

- ✓ A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.
- ✓ Encourage construction contractors to apply for AQMD "SOON" funds. Incentives could be provided for those construction contractors who apply for AQMD "SOON" funds. The "SOON" program provides funds to accelerate clean up of off-road diesel vehicles, such as heavy duty construction equipment. More information on this program can be found at the following website: <http://www.aqmd.gov/tao/Implementation/SOONProgram.htm>

For additional measures to reduce off-road construction equipment, refer to the mitigation measure tables located at the following website:
www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html.

4. The lead agency determined that the project will result in significant GHG impacts, therefore, the AQMD staff recommends that pursuant to Section 15126.4 of the CEQA Guidelines the lead agency require the following mitigation measures in addition to the measures identified in the Draft EIR.

Additional Operational Mitigation Measures - Energy Efficiency

- a) Maximize use of solar energy including solar panels; installing the maximum possible number of solar energy arrays on the building roofs and/or on the Project site to generate solar energy for the facility.
- b) Require all lighting fixtures, including signage, to be as energy efficient as possible, and require that new traffic signals have light-emitting diode (LED) bulbs and require that outdoor light fixtures be energy efficient compact fluorescent and/or LED light bulbs. Where feasible use solar powered lighting.
- c) Use light colored paving and roofing materials.
- d) Use passive heating, natural cooling, solar hot water systems, and reduced pavement.
- e) Limit the hours of operation of outdoor lighting.
- f) Install light colored "cool" roofs and cool pavements.
- g) Use electric appliances (e.g. stoves) and gardening equipment.

Additional Operational Mitigation Measures - Transportation

- h) Provide electric car charging (not just wiring) stations for tenants and provide designated areas for parking of zero emission vehicles (ZEVs) for car-sharing programs.
- i) Provide incentives to encourage public transportation and carpooling.
- j) Provide incentives for employees and the public to use public transportation such as discounted transit passes, reduced ticket prices, and/or other incentives.
- k) Implement a rideshare program for employees in commercial/retail uses.
- l) Construct off-site bicycle facility improvements, such as bicycle trails linking the facility to designated bicycle commuting routes.

- m) Require the use of 2010 diesel trucks, or alternatively fueled, delivery trucks (e.g., food, retail and vendor supply delivery trucks) upon project build-out.
- n) Create local “light vehicle” networks, such as neighborhood electric vehicle (NEV) systems.
- o) Require the use of electric or alternative fueled maintenance vehicles.

Additional Operational Mitigation Measures - Other

- p) Provide outlets for electric and propane barbecues in residential areas.
- q) Require use of electric lawn mowers and leaf blowers.
- r) Require use of electric or alternatively fueled sweepers with HEPA filters.
- s) Require use of water-based or low VOC cleaning products.