



# South Coast Air Quality Management District

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E-Mailed: December 11, 2012  
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## **Review of the Draft Environmental Impact Report (Draft EIR) for the Millennium Hollywood Project**

The South Coast Air Quality Management District (AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are intended to provide guidance to the lead agency and should be incorporated into the Final Environmental Impact Report (Final EIR) as appropriate.

Based on a review of the Draft EIR the AQMD staff recognizes the potential regional air quality benefits from projects that facilitate mixed land uses in close proximity to mass transit. However, given the significant health risk impacts from placing the proposed project's sensitive land uses (e.g., residential uses) within close proximity to the 101 Freeway (a significant source of Toxic Air Contaminants, TACs) it is crucial that the lead agency implement all feasible measures to reduce this impact. Further, AQMD staff recommends that the lead agency consider additional mitigation measures to minimize the project's significant regional construction and operations-related air quality impacts pursuant to Section 15126.4 of the California Environmental Quality Act (CEQA) Guidelines. Lastly, the lead agency should consider updating the health risk assessment (HRA) based on more recent emission factors and traffic data. Details regarding these comments are attached to this letter.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. Further, 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". The signature is written in a cursive style with a large initial "I" and "M".

Ian MacMillan

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

Attachment

IM:DG

LAC121107-01  
Control Number

### Health Risk Mitigation

1. The Draft EIR concludes the residents living on the project site will be exposed to significant levels of air pollution from the nearby freeway. The lead agency also concludes that the one proposed mitigation measure (enhanced filtration in building's ventilation system) will not reduce this impact to a less than significant level. The HRA contained in the Draft EIR appropriately contains additional measures that seem to be feasible to reduce potential exposures. Specifically, the Final EIR should consider:
  - a. Placing air intakes as far from the freeway as possible (for example, on the roof),
  - b. Limiting the use of operable windows and/or balconies on portions of the site closest to the freeway,

Also, the Final EIR should consider two additional measures:

- c. Provide a means to ensure that high efficiency filters will continue to be maintained and replaced for the life of the project (e.g., through a provision in the covenants, conditions and restrictions, CC&Rs), and
- d. Consider maintaining positive pressure with the building's filtered ventilation system in living spaces to reduce infiltration of unfiltered outdoor air.

### Operational Mitigation Measures

2. Given that the lead agency determined that the proposed project will exceed the CEQA regional operational significance thresholds for NO<sub>x</sub> and VOC's the AQMD staff recommends that the lead agency provide the following additional mitigation measures pursuant to CEQA Guidelines Section 15126.4.

### Transportation

- a. Require electric car charging stations (not just wiring infrastructure) for both non-residential and residential uses at the project site.

### Energy

- b. Require the project site to include a solar photovoltaic or an alternate system with means of generating renewable electricity.

### Other

- c. Provide outlets for electric and propane barbecues in residential areas.
- d. Require use of electric lawn mowers and leaf blowers.
- e. Require use of electric or alternatively fueled sweepers with HEPA filters.
- f. Require use of water-based or low VOC cleaning products.

### Construction Equipment Mitigation Measures

3. The lead agency determined that the proposed project will exceed the CEQA construction significance threshold regionally for NO<sub>x</sub> and VOC's and locally for

PM2.5 and NOX; therefore, AQMD staff recommends that the lead agency provide the following additional mitigation measures pursuant to CEQA Guidelines Section 15126.4.

- 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.

#### Health Risk Assessment

4. The proposed project will allow new high density residential units to be placed in close proximity to the 101 Freeway that currently carries over 200,000 vehicles per day. As a result, the project's sensitive land uses will be exposed to a significant source of TACs. In determining potential health risks, the lead agency should use the most comprehensive and recent air quality data available. Therefore, the AQMD staff recommends that the lead agency consider revising its health risk assessment using the latest emissions factors from EMFAC 2011 as opposed to the outdated CT-EMFAC 2007, and using the Caltrans Performance Measurement System (PeMS)<sup>1</sup> to analyze the duration, volume, and speed of peak traffic activity on the 101 Freeway.

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<sup>1</sup> <http://pems.dot.ca.gov/>