



South Coast Air Quality Management District

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Review of the Draft Environmental Impact Report (Draft EIR) for the Proposed Barlow Hospital Replacement and Master Plan Project

The South Coast Air Quality Management District (AQMD) 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 about the significant construction and operational related air quality impacts from the proposed project. Specifically, the lead agency determined that the project will exceed the AQMD's CEQA regional significance thresholds for NO_x and VOC emissions during construction and operation of the project. Further, the lead agency determined that the project will exceed the AQMD's CEQA localized significance thresholds for PM₁₀ and PM_{2.5} during construction of the project. As a result, the AQMD staff recommends that pursuant to Section 15126.4 of the CEQA Guidelines the lead agency require the following additional mitigation measures in the Draft EIR.

Additional Construction Mitigation Measures

- Use coatings and solvents with a VOC content lower than that required under AQMD Rule 1113.
- Construct or build with materials that do not require painting or use pre-painted construction materials.
- Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow.
- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site.
- Reroute construction trucks away from congested streets or sensitive receptor areas.

- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation.
- Improve traffic flow by signal synchronization.
- Require the use of electricity from power poles rather than temporary diesel or gasoline power generators.
- 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.
- During project construction, all internal combustion engines/construction, equipment operating on the project site shall meet EPA-Certified Tier 3 emissions standards, or higher according to the following:
 - ✓ Project start, 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.
 - ✓ 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.

Additional Operational Mitigation Measures - Energy Efficiency

- Install the maximum feasible number of solar energy arrays on the building roofs and/or on the project site to generate solar energy for the facility.
- Require all lighting fixtures, including signage, to be state-of-the art and energy efficient, and require that new traffic signals have light-emitting diode (LED) bulbs and require that light fixtures be energy efficient compact fluorescent and/or LED light bulbs. Where feasible, use solar powered lighting. This measure shall apply to all lighting fixtures at the project site, including those outside the building envelope (e.g., parking structures and walkway lighting).
- Use passive heating, natural cooling, solar hot water systems, and reduced pavement.
- Limit the hours of operation of outdoor lighting.
- Utilize only Energy Star heating, cooling, and lighting devices, and appliances.
- Install light colored “cool” roofs and cool pavements.
- Use electric appliances (e.g. stoves) and gardening equipment.

Additional Operational Mitigation Measures - Transportation

- Provide electric car charging stations for tenants beyond the requirements of the Los Angeles Green Building Code Ordinance. Also, provide designated areas for parking of zero emission vehicles (ZEVs) for car-sharing programs.
- Implement a home dispatching system where employees receive routing schedules by phone rather than driving to work, especially on game days with high expected attendance at Dodger Stadium.
- Provide incentives to encourage carpooling.
- Provide incentives for employees and the public to use public transportation such as discounted transit passes, reduced ticket prices, and/or other incentives.
- Implement a rideshare program for employees.
- Construct off-site bicycle facility improvements, such as bicycle trails linking the facility to designated bicycle commuting routes.
- Create local “light vehicle” networks, such as neighborhood electric vehicle (NEV) systems.
- Require the use of electric or alternative fueled maintenance vehicles.

Additional Operational Mitigation Measures - Other

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

Pursuant to Public Resources Code Section 21092.5, AQMD staff requests that the lead agency provide the AQMD 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,



Ian MacMillan

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

Attachment

IM:DG

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