



South Coast Air Quality Management District

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E-Mailed: October 18, 2013
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Review of the Draft Environmental Impact Report (Draft EIR) for the Proposed Los Angeles Street Civic Building 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 environmental impact report (Final EIR) as appropriate.

The SCAQMD staff is concerned about the significant regional operational air quality impacts from the proposed project. Specifically, the lead agency determined that the project will exceed the SCAQMD's CEQA regional significance thresholds for NO_x and VOC emissions during operation of some of the alternatives of the proposed project. Therefore, the SCAQMD 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) Use passive heating, natural cooling, solar hot water systems, and reduced pavement.
- c) Require all lighting fixtures, including signage, to be energy efficient. Where feasible, use solar powered lighting and limit the hours of operation of outdoor lighting.
- d) Utilize only Energy Star heating, cooling, and general appliances.
- e) Install light colored "cool" roofs and cool pavements.

Additional Operational Mitigation Measures – Transportation

- f) Provide electric car charging stations for tenants. Also, provide designated areas for parking of zero emission vehicles (ZEVs) for car-sharing programs.

- g) Provide incentives for employees and the public to use public transportation such as discounted transit passes and/or other incentives.
- h) Create local "light vehicle" networks, such as neighborhood electric vehicle (NEV) systems.
- i) Require the use of 2010 compliant diesel trucks, or alternatively fueled, delivery trucks (e.g., food, retail and vendor supply delivery trucks) at commercial/retail sites upon project build-out. If this isn't feasible, consider other measures such as incentives, phase-in schedules for clean trucks, etc.

Additional Operational Mitigation Measures - Other

- j) Require use of water-based or low VOC cleaning products.
- k) Require use of electric lawn mowers and leaf blowers.
- l) Require use of electric or alternatively fueled sweepers with HEPA filters.
- m) Require the use of electric or alternative fueled maintenance vehicles.

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



Ian MacMillan

Program Supervisor, CEQA Inter-Governmental Review
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[IM:DG](#)

LAC130906-05
Control Number