



South Coast
Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Ms. Jane Choi
City of Los Angeles, City Hall
Department of City Planning
200 N. Spring Street, Room 750
Los Angeles, CA 90012

Draft Mitigated Negative Declaration (Draft MND) for the Proposed Mixed Residential Use Building Located 900, 904, 906, 912, 916, 922, 926, 932 N. La Brea Ave. and 7069 Willoughby Ave.; Hollywood (ENV-2014-4075)

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 MND.

In the project description, the Lead Agency proposes to demolish all buildings and export 30,000 cubic yards of material. Construction will include approximately 150,000 square feet of mixed-use residential and approximately 37,385 square feet of commercial retail.

Based on a review of the Draft MND the Lead Agency determined that the proposed project will result in significant regional air quality impacts during construction. SCAQMD staff has concerns about the analysis performed for this Project, which might have led to an under-estimation of the Project's air quality and health risk impacts. Additional details are included in the attachment.

The SCAQMD staff is available to work with the Lead Agency to address these concerns and any other air quality questions that may arise. Please contact Jack Cheng, Air Quality Specialist at (909) 396-2448, if you have any questions regarding these comments. We look forward to reviewing and providing comments for the Final MND associated with this project.

Sincerely,

Jillian Wong

Jillian Wong, Ph.D.

Program Supervisor

Planning, Rule Development & Area Sources

JW:JC
LAC 150122-02
Control Number
Attachment

Attachment

Air Quality Analysis

1. The Lead Agency determined that during demolition, 12 haul trips will be required to haul away waste material. It is unclear how the Lead Agency determined the amount of waste material generated or the number of trips that will be required. The Lead Agency should provide additional information regarding demolition waste removal calculations and revise the Air Quality analysis in the Final MND, if necessary.
2. The Lead Agency determined that during grading 30,000 cubic yards of material will be exported and only 400 haul trips will be required. It is unclear how the Lead Agency determined the number of trips that will be required. The Lead Agency should provide additional information regarding grading and soil export calculations and revise the Air Quality analysis in the Final MND, if necessary.

Recommended Changes

Mitigation Measure 3-5: ~~All diesel field off road construction equipment used in the grading and construction phases shall have Tier 3 or 4 engines that are certified by the U.S. EPA installed to reduce NOx emissions.~~ All off road 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.

Additional Construction Mitigation Measures

- 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.
- Consistent with measures that other Lead Agencies in the South Coast Air Basin (including Port of Los Angeles, Port of Long Beach, Metro and City of Los Angeles)1 have enacted, require all on-site construction equipment to meet the following:
 - 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 SCAQMD "SOON" funds. Incentives could be provided for those construction contractors who apply for SCAQMD "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/home/programs/business/business-detail?title=off-road-diesel-engines&parent=vehicle-engine-upgrades>.

- Require the use of electricity from power poles rather than temporary diesel or gasoline power generators.
- Provide temporary traffic controls such as a flag person, during all phases of significant construction activity 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.
- Limit soil disturbance to the amounts analyzed in the Final MND.
- All materials transported off-site shall securely covered.
- Apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more).
- Traffic speeds on all unpaved roads to be reduced to 15 mph or less.
- Construct or build with materials that do not require painting.
- Require the use of pre-painted construction materials.

For additional measures to reduce off-road construction equipment, refer to the mitigation measure tables located at the following website:

http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html