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South Coast
Air Quality Management District
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E-Mailed: June 1, 2011
Srimal.Hewawitharana@lacity.org

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Department of City Planning
200 North Spring Street
Los Angeles, CA 90012

**Review of the Draft Environmental Impact Report (Draft EIR)
for the Proposed Hollywood Community Plan Update 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.

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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 and intensify existing sensitive land uses within 500 feet of the 101 Freeway. The 101 Freeway is a potentially significant source of toxic air pollutants due to the approximate 221,000 vehicles per day that 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 101 Freeway. If the lead agency determines that a mitigation measure requiring a 500 foot buffer between the 101 Freeway and sensitive land uses is infeasible then the potential health risk impacts to these receptors should be quantified. In the event that the final EIR demonstrates significant adverse air quality impacts the lead agency should require

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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.

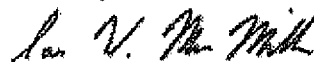
² California Air Resources Board. April 2005. "Air Quality and Land Use Handbook: A Community Health Perspective." Accessed at: <http://www.arb.ca.gov/ch/landuse.htm>

mitigation pursuant to Section 15092 of the California Environmental Quality Act (CEQA) Guidelines. Further, 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. Details regarding these comments are attached to this letter.

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cont.

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

LAC110308-06
Control Number

Potential Health Risk Impacts to Sensitive Land Uses

1. Based on the lead agency's discussion regarding toxic air contaminants (Section 4.6) in the draft EIR the proposed project includes sensitive land uses within 500 feet of the 101 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.

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The lead agency relies on the use of air filters with a minimum efficiency reporting value (MERV) of 13 placed in residential HVAC systems combined with other measures (e.g., inoperable windows facing the freeway) to mitigate the project's health risk impacts from the 101 Freeway below the significance level. While these measures can be effective against particulate pollution they do not have the ability to remove a wide variety of gaseous pollutants (i.e., NO_x, TAC's and VOC's) associated with traffic-related pollution. These measures also have no effectiveness on outdoor activities associated with residential uses and filters can require long term and potentially costly maintenance. Lastly, 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.

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Mitigation Measures for Construction Air Quality Impacts

2. 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 revising mitigation measure one (1) on page 4.6-26 and 4.6-27 of the draft EIR as follows:

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- 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, and ensure that all vehicles and equipment will be properly tuned and maintained according to manufacturers' specifications,
- 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,
- Require the use of pre-painted construction materials,
- Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export),
- Require all vehicles and equipment to be properly tuned and maintained according to manufacturers' specifications,
- Prohibit truck idling in excess of five minutes,
- During project construction, all internal combustion engines/construction equipment operating on the project site shall meet EPA-Certified Tier 2 emissions standards, or higher according to the following:
 - ✓ Project Start, to December 31, 2011: All offroad diesel-powered construction equipment greater than 50 hp shall meet Tier 2 offroad emissions standards. In addition, all construction equipment shall be outfitted with the 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 2 or Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
 - ✓ January 1, 2012, 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>

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cont.

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.

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