



South Coast  
Air Quality Management District

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E-Mailed: September 16, 2011  
Hadar.Plafkin@lacity.org

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Mr. Hadar Plafkin  
Department of City Planning  
200 North Spring Street, Room 750  
Los Angeles, CA 90012

**Review of the Draft Environmental Impact Report (Draft EIR)  
for the Proposed Century Plaza Mixed-Use Development 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 (EIR) as appropriate.

The AQMD staff is concerned about the significant air quality impacts that the proposed project will have on the region and local residents during construction. As a result, the AQMD staff recommends that the lead agency require additional construction mitigation measures pursuant to Section 15126.4 of the CEQA Guidelines. Details regarding these comments are attached to this letter.

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,

A handwritten signature in black ink that reads "Ian V. MacMillan".

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

Attachment

[IM:DG](#)

LAC110721-05  
Control Number

Mitigation Measures for Construction Air Quality Impacts

1. The lead agency determined that the proposed project will exceed the regional and localized construction significance thresholds for NO<sub>x</sub>, VOC, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions resulting in significant air quality impacts. Therefore, AQMD staff recommends that the lead agency provide additional mitigation measures pursuant to CEQA Guidelines Section 15126.4 including the following
  - 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 PM<sub>10</sub> generation,
  - Improve traffic flow by signal synchronization, and ensure that all vehicles and equipment will be properly tuned and maintained according to manufacturers' specifications,
  - Construct or build with materials that do not require painting,
  - Require the use of pre-painted construction materials,
  - Require all vehicles and equipment to be properly tuned and maintained according to manufacturers' specifications,
  - Require the use of cleanest burning haul trucks available, such as trucks that meet 2010 model year EPA standards,
  - 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>

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