



South Coast Air Quality Management District

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200 North Spring Street, Room 667
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Review of the Draft Environmental Impact Report (Draft EIR) for the West Adans-Baldwin Hills Leimert New Community Plan

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document. The following comment is intended to provide guidance to the lead agency and should be incorporated into the Final Environmental Impact Report (Draft or Final EIR) as appropriate.

The AQMD appreciates that the lead agency reviewed the California Air Resources Board's (CARB's) Air Quality Land Use Handbook: A Community Perspective (Handbook), and that the lead agency has utilized some of the guidance offered by the CARB Handbook on siting incompatible land uses and "sensitive land uses" (e.g., residences, parks, schools and medical facilities) to mitigate the project's significant air quality impacts. Specifically, the lead agency incorporated mitigation measure (MM) AQ-2 to minimize potentially significant health risk impacts to new sensitive land uses placed within 500 feet of the I-10 Freeway. However, the AQMD staff is concerned that MM AQ-2 does not provide sufficient measures to avoid potentially significant air quality impacts resulting from industrial land uses in the plan area. Specifically, MM AQ-2 does not address potentially significant air quality impacts that may result from the placement of sensitive receptors next to industrial land uses that could emit elevated levels of TAC's. Therefore, the AQMD staff recommends that the lead agency provide additional mitigation that precludes the establishment of sensitive land uses within the CARB recommended buffers to avoid significant air quality impacts. Further, the lead agency should consider additional mitigation measures to minimize the project's significant construction-related air quality impacts and greenhouse gas (GHG) impacts pursuant to Section 15126.4 of the California Environmental Quality Act (CEQA) Guidelines. Details regarding these comments are attached to this letter.

Pursuant to Public Resources Code Section 21092.5, please 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
Planning, Rule Development & Area Sources

Attachment

IM:DG

LAC120918-01
Control Number

Siting Criteria and Future Project Planning

1. The AQMD staff recognizes the proposed project potentially provides regional air quality benefits by increasing residential densities near employment and transportation centers. However, the proposed project is a mixed use overlay zone that also includes zone changes for select areas that will result in the placement of residential uses in close proximity to industrial zones: This future juxtaposition may expose local residents to potentially significant sources of emissions.

The AQMD staff appreciates that the lead agency has reviewed the CARB Air Quality and Land Use Handbook¹ and that the lead agency has utilized the guidance offered by the handbook on siting incompatible land uses and “sensitive land uses” near high traffic freeways (e.g., the I-10 Freeway) to develop MM AQ-2. However, the AQMD staff is concerned that MM AQ-2 does not provide sufficient measures to avoid potential significant air quality impacts from toxic air contaminants (TAC’s) resulting from industrial land uses such as local chrome platers. Specifically, MM AQ-2 does not address potentially significant air quality impacts that may result from the placement of sensitive receptors next to industrial land uses that could emit elevated levels of TAC’s. Therefore, the AQMD staff recommends that the lead agency provide additional mitigation that precludes the establishment of sensitive land uses within all applicable CARB recommended buffers to avoid additional significant air quality impacts.

Further, the AQMD staff recommends that the lead agency provide additional discussion in the Final EIR that addresses potential proximity issues such as odor impacts to future sensitive land uses from industrial activity in the plan area. The AQMD staff recognizes that the lead agency has determined that the project will not emit significant odors as discussed on page 4.3-18 of the Draft EIR; however, the AQMD staff recommends that the lead agency expand this discussion to include potential inward impacts to future sensitive land uses from industrial activity in the plan area.

Construction Equipment Mitigation Measures

2. Given that the lead agency’s regional construction and operational air quality analysis demonstrates that the criteria pollutant emissions exceed the AQMD’s daily significance thresholds for NOX, VOC, PM10 and PM2.5, the AQMD recommends that the lead agency consider adding the following mitigation measure to further reduce air quality impacts from the project, if feasible:
 - 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.

¹ California Air Resources Board recommended buffer zones can be found in the “Air Quality and Land Use Handbook: A Community Health Perspective.” Accessed at: <http://www.arb.ca.gov/ch/landuse.htm>

- 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.
3. The Draft EIR demonstrates that the proposed project will exceed the lead agency's GHG significance threshold; therefore, the AQMD staff recommends that the lead agency provide the following additional mitigation measures pursuant to CEQA Guidelines Section 15126.4.

Additional Operational Mitigation Measures - Energy Efficiency

- 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.
- 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.
- Use light colored paving and roofing materials.
- Use passive heating, natural cooling, solar hot water systems, and reduced pavement.
- Limit the hours of operation of outdoor lighting.
- Utilizing 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.
- Provide incentives to encourage public transportation and carpooling at commercial locations.
- Implement a rideshare program for employees at commercial site.
- Construct bicycle facility improvements, such as bicycle trails linking the facility to designated bicycle commuting routes or on-site improvements such as bicycle paths, bicycle parking facilities, etc.
- Require the use of 2010 diesel trucks, or alternatively fueled, delivery trucks (e.g., food, retail and vendor supply delivery trucks) at commercial sites.
- Provide an alternative fueling station for delivery trucks (e.g., natural gas or electric).

- Create local “light vehicle” networks, such as neighborhood electric vehicle (NEV) systems.
- Require the use of electric or alternative fueled maintenance vehicles at commercial facilities and multifamily residences.

Additional Operational Mitigation Measures - Other

- Provide outlets for electric and propane barbecues in multi-family residential and recreational 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 at commercial sites.