



South Coast Air Quality Management District

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FAXED: AUGUST 3, 2006

August 3, 2006

Ms. Martha Welborne
The Los Angeles Grand Avenue Authority
c/o California Community Foundation
445 South Figueroa Street, Suite 3400
Los Angeles, CA 90071

Dear Ms. Welborne:

**Draft Environmental Impact Report (DEIR) for The Grand Avenue Project:
Los Angeles: June 2006**

The South Coast Air Quality Management District (SCAQMD) 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 in the Final Environmental Impact Report.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Environmental Impact Report. The SCAQMD would be willing to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Charles Blankson, Ph.D., Air Quality Specialist – CEQA Section, at (909) 396-3304 if you have any questions regarding these comments.

Sincerely

Steve Smith
Program Supervisor, CEQA Section
Planning, Rule Development & Area Sources

Attachment

SS: CB
LAC060614-04
Control Number

**Draft Environmental Impact Report (DEIR) for
The Grand Avenue Project, Los Angeles: June 2006**

1. **URBEMIS Model Results:** In footnote (a) to Table 57, the lead agency states that the construction emissions quantities are taken from the URBEMIS model printout sheets and/or calculation worksheets presented in Appendix D. Please note that the URBEMIS model printout sheets in Appendix D do not include construction emissions. They show only operational emissions. As a result, SCAQMD staff could not verify construction emissions from the proposed project. Please provide the URBEMIS construction output printout in the Final EIR.
2. **Parcel Q:** On page 116 of the DEIR, there appears to be a typographical error regarding the area of Parcel Q, which is shown as 1.1.14 million square feet of space.
3. **Carbon Monoxide (CO) Hot Spots:** Table 59 on page 545 of the DEIR reports CO concentrations for the intersection of Figueroa Street and Third Street. However, a CO hotspots analysis was not found for this intersection in the appendices. SCAQMD staff is therefore unable to verify the CO hotspots analysis for this intersection. The Final EIR should include the details of the CO hotspots analyses for all intersections that are reported in the DEIR and that are impacted by the proposed project.
4. **Traffic Volumes:** The traffic volumes in the CO hotspots analysis do not appear to match those in the Traffic Report. The traffic volumes in the Final EIR should be consistent.
5. **Reducing Construction Emissions:** Because construction emissions from the proposed project are estimated to exceed the daily significance thresholds during construction for nitrogen oxides (NO_x), carbon monoxide (CO), volatile organic compounds (VOC) and particulate matter (PM₁₀), even after the implementation of the recommended mitigation measures as stated on page 566 of the DEIR, SCAQMD staff recommends that the lead agency consider modifying the following mitigation measures and adding additional mitigation measures to further reduce air quality impacts from the proposed project. Given that the air basin is designated non-attainment with respect to ozone and PM₁₀, it is important that the lead agency consider these changes.
 - Mitigation Measure F-9 should be modified to include trucks not idling in excess of five minutes to be consistent with state law.

- Mitigation Measure F-2 should be modified to consider restricting the number of gallons of coatings used per day. The lead agency should also encourage water-based coatings or coatings with a lower VOC content than 100 grams per liter.

Finally, consider using materials that do not need to be painted or are painted prior to transporting to the site.

SCAQMD staff recommends that the lead agency also consider the following mitigation measures where feasible:

- Provide temporary wind fencing around the sites that are being graded/excavated to reduce dirt/dust being blown over to adjoining properties.
- Provide a staging area off-site for construction workers and provide shuttle buses to convey workers to the project site from the staging area.
- Arrange for mobile food caterers to come to the project site during lunch break.
- Provide temporary traffic controls (e.g., flag person) during construction to ensure smooth traffic flows.
- Reroute construction trucks away from congested streets.
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity and all emissions related matters. Post a publicly visible sign with name of contact person and telephone number for dust complaints.