



South Coast Air Quality Management District

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FAXED: NOVEMBER 16, 2006

November 16, 2006

Mr. Tim Ottman
County of Los Angeles
Fire Department
1320 North Eastern Avenue
Los Angeles, CA 90063-3294

Dear Mr. Ottman:

**Draft Environmental Impact Report (DEIR) for the
Consolidated Fire Protection District Headquarters Complex
(October 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 available 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, Ph.D.
Program Supervisor, CEQA Section
Planning, Rule Development & Area Sources

Attachment

SS: CB

LAC060929-06
Control Number

Draft Environmental Impact Report (DEIR) for the Consolidated Fire Protection District Headquarters Complex

Localized Air Quality Impacts

Consistent with the SCAQMD's environmental justice program and policies, the SCAQMD recommends that the lead agency evaluate localized air quality impacts of the proposed project. SCAQMD staff recommends that for this project and for future projects, the lead agency undertake the localized analysis for both construction and operation to ensure that all necessary and feasible mitigation measures are implemented to protect the health of existing or potential sensitive receptors close to the proposed project. The methodology for conducting the localized significance thresholds analysis can be found on the SCAQMD website at: www.aqmd.gov/ceqa/handbook/LST/LST.html

Reducing Construction VOC Emissions

In Table 3.2.6-1: Peak Day Construction Emissions after Mitigation, VOC emissions during building construction, primarily from coating operations, exceed by a wide margin the daily construction VOC significance threshold of 75 pounds. Although no mitigation measures to reduce coating emissions are identified in the DEIR, the lead agency concludes on page 3.2-18 that the project will not generate significant daily or quarterly construction emissions. On page 13 of Appendix B the lead agency identifies a potential measure to mitigate VOC emissions from coating operations, i.e., use pre-coated materials, but does not include this in the list of mitigation measures on pages 3.2-16 through 3.2-18 of the DEIR. On page 14 of Appendix B, the lead agency further states that "VOC emissions would not adversely impact sensitive receptors locally because they are a regional pollutant in that they react in the atmosphere to form ozone at some distance from the source. Emissions associated with growth and facilities needed to serve this growth have been accounted for in the adopted AQMP and offsets identified in the AQMP." SCAQMD staff rejects these arguments.

VOC emissions are considered ozone precursors because they contribute to ozone formation and ozone is a regional pollutant as noted by the lead agency. In order to meet the federal eight-hour ozone standard, analysis for the 2007 Air Quality Management Plan (AQMP) indicates that the SCAQMD is relying on long-term "black box" control measures to achieve approximately 135 tons of VOC emissions reductions per day. Black box measures are unknown future advances in technology. Therefore, there is a need for measures to mitigate significant adverse air quality impacts, in particular VOC emissions, as required by CEQA.

Therefore, SCAQMD staff recommends the following mitigation measures for consideration by the lead agency:

- Restrict the number of gallons of coatings used per day.
- Encourage water-based coatings or other low-emitting alternatives.

- Consider requiring the use of coatings with a lower VOC content than 100 grams per liter, as required by SCAQMD Rule 1113- Architectural Coatings.
- Consider requiring paint contractors to use hand applications instead of spray guns.