



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Draft Environmental Impact Report (DEIR) for the Proposed Olympic Tower Project

South Coast Air Quality Management District (SCAQMD) staff 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 CEQA document.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to demolish all existing structures on the site and construct a mixed use development containing 374 residential units, 373 hotel rooms, 33,498 square feet of office space, 10,801-square-foot conference center, and 65,074 square feet of commercial uses. The project is located at 813-815 West Olympic Boulevard and 947-951 South Figueroa Street on the northwest corner of West Olympic Boulevard and South Figueroa Street in the community of Central City.

SCAQMD Staff's Comments

The Lead Agency determined the proposed project would have significant impacts to regional air quality during construction.¹ In order to mitigate the significant impacts, the Lead Agency included two mitigation measures: C-1 and C-2.² SCAQMD staff has concerns that mitigation measure C-1 is not enforceable or consistent with the modeling assumptions, taking credit for emission reductions that may not occur.

Upon review of the DEIR, SCAQMD staff found that in mitigation measure C-1 the Lead Agency is committing to the use of off-road construction equipment that meets USEPA Tier 4 emission standards, where available.³ However, in the Air Quality – Green House Gases (AQ-GHG) Appendices, the CalEEMod output files shows that the Lead Agency assumed full compliance with mitigation measure C-1 by including Tier 4 Final as a form of mitigation for all construction equipment.⁴ As written, the current mitigation measure does not require full compliance, therefore full compliance should not have been assumed in the CalEEMod input. In order to make the mitigation measure enforceable and consistent with the current modeling assumptions, SCAQMD staff recommends that the Lead Agency consider the following revision to mitigation measure C-1, below.

Revised Mitigation Measure C-1:

All off-road construction equipment greater than 50 hp shall be required to meet USEPA Tier 4 emission standards, ~~where available~~, to reduce NOx, PM10, and PM2.5 emissions at the Project site. In addition, all construction equipment shall be outfitted with Best Available Control Technology devices certified by CARB. Any emissions control device used by the contractor

¹ DEIR, Page IV. C-22 – 23.

² *Ibid*, Page IV. C-26 – 27.

³ *Ibid*, Page IV. C-26.

⁴ AQ-GHG Appendices, CalEEMod Olympic Tower L.A. Future – Annual, Winter, and Summer Runs, Pages 1-5.

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. At the time of mobilization of each applicable unit of equipment, a copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided.

If full compliance of mitigation measure C-1 is not feasible, SCAQMD staff recommends the Lead Agency revise the modeling assumptions so that full compliance is not assumed and the actual air quality impacts during construction of the proposed project are disclosed.

Response to Comments

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), SCAQMD staff requests that the Lead Agency provide SCAQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful or useful to decision makers and to the public who are interested in the proposed project.

SCAQMD staff is available to work with the lead agency to address any air quality questions that may arise from this comment letter. Please contact Alina Mullins, Assistant Air Quality Specialist, at amullins@aqmd.gov or (909) 396-2402, should you have any questions.

Sincerely,

Jillian Wong

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