



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Draft Environmental Impact Report (Draft EIR) for the Proposed 1001 Olympic (Olympia) Project (SCH No.: 2017101008)

The 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 a 43,892-square-foot medical facility and construct three buildings totaling 1,845,831 square feet, with subterranean parking, on 3.26 acres. The project will be developed with one of two development scenarios: Option 1, which will include 1,367 residential units or Option 2, which will include 879 residential units and a hotel with 1,000 rooms (proposed project). The project is located on the northwest corner of Olympic Boulevard and Georgia Street in the city of Los Angeles.

SCAQMD Staff's Summary of Air Quality Analysis

The lead agency determined that the project's regional operational VOC and NO_x emissions would result in significant and unavoidable impacts.¹ Please see SCAQMD staff's detailed comments below.

SCAQMD Staff's Comments

Overlapping Construction and Operational Impacts Analysis

It is reasonably foreseeable that construction of the proposed project would not be completed until 2033. Assuming a 2033 build-out, one of the three buildings may become operational while another building is still under construction. Therefore, lead agency should perform an overlapping construction and operational impacts analysis. The lead agency should identify the overlapping years, combine construction emissions (including emissions from demolition) with operational emissions, and compare the combined emissions to SCAQMD's air quality CEQA operational thresholds of significance to determine the project's air quality impacts. In the event that the lead agency finds that the proposed project's air quality impacts would be significant, mitigation measures will be required.²

Additional Mitigation Measures for Operational Emissions

The proposed project will have regional operational impacts on air quality due to VOCs emissions from consumer products and NO_x emissions from passenger vehicles. In order to further reduce emissions from building operations, SCAQMD staff recommends the following mitigation measures:

- Reduce mobile source emissions from employee commute. Encourage any employer that employs 250 or more employees at a work site, on a full or part-time basis, to implement an Employee Commute Reduction Program (ECRP) under SCAQMD Rule 2202, On-Road Motor

¹ DEIR. Pages IV.B-29 – 3.

² CEQA Guidelines Section 15126.4

Vehicle Mitigation Option. For more information on Rule 2202 and guidelines for the ECRP, please visit SCAQMD's website at: <http://www.aqmd.gov/home/programs/business/business-detail?title=rule-2202-on-road-motor-vehicle-mitigation-options>.

- 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.
- Limit parking supply and unbundle parking costs.
- Require that 240-Volt electrical outlets or Level 2 chargers be installed in parking lots that would enable charging of NEV and/or battery powered vehicles. It is important to make this electrical infrastructure available when the project is built so that it is ready when this technology becomes commercially available. The cost of installing electrical charging equipment onsite is significantly cheaper if completed when the project is built compared to retrofitting an existing building.
- Maximize the planting of low VOC and/or California Native trees in the landscaping and parking lots.
- Use light colored paving and roofing materials.
- Install light colored "cool" roofs and cool pavements.
- Utilize only Energy Star heating, cooling, and lighting devices and appliances.

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,

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