



# South Coast Air Quality Management District

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FAXED: May 19, 2006

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Mr. Jonathan H. Riker, Project Coordinator  
City of Los Angeles, Dept. of City Planning  
City Hall, Room 750  
200 North Spring Street  
Los Angeles, CA 90012

**Hollywood/Garfield Mixed-Use Development Draft Environmental Impact Report**  
**(Draft EIR) No. ENV-2004-3814-EIR**

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 into 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 adoption of the Final Environmental Impact Report. The SCAQMD staff would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

Susan Nakamura  
Planning & Rules Manager  
Planning, Rule Development & Area Sources

Attachment

SN:GM

LAC060404-03  
Control Number

### **Construction Emissions**

1. On page IV.C-11 in Volume I of the Draft EIR, the lead agency states that construction would occur in two phases including excavation and grading for the subterranean parking structure and building foundations. In Table IV.C-4 on page IV.C-12 of Volume I (Estimated Peak Daily Construction Emissions), the lead agency shows estimated emissions for Site Excavation and Grading. From the narration under construction on page IV.C-11 in Volume I and the Air Quality Analysis in Appendix A of Volume II, neither the narration or the URBEMIS 2002 computer modeling output sheets discusses or shows the equipment other than an excavator and loaders related to excavation, e.g., the number of trucks that might be used to remove excavated soil including the number of truck trips and vehicle miles traveled from the construction site to the disposal site, etc. The Draft EIR also does not include the area of the subterranean garage or the amount of soil that would be removed in excavating the subterranean garage, the building footings and utilities. The Final EIR should include a discussion of how these activities are accounted for in the air quality analysis with Table IV.C-4 being revised as needed.

### **Local Significance Threshold**

2. Because the proposed site is located less than a quarter-mile from an existing middle and high school, multi-family residential buildings and motels (page III-3 in Volume I of the Draft EIR), a localized air quality analysis may be warranted to ensure that the students and residents in those existing land uses are not adversely affected by the construction activities that are occurring in close proximity. SCAQMD guidance for performing a localized air quality analysis can be found at the following web address: <http://www.aqmd.gov/ceqa/handbook/LST/LST.html> .

### **Architectural Coatings**

3. On page 6 of the URBEMIS 2002 output sheets in Volume II under construction, the lead agency has changed the pounds of ROG per 1000 square feet default value for architectural coatings for residential and non-residential uses from 0.0185 to 0.0052 without an explanation to support the lower emission factor. In the Final EIR, the lead agency should include an explanation to support the lower value or revise the modeling using the default value of 0.0185.

### **Mitigation Measures - Construction**

4. In addition to the short-term (construction) mitigation measures proposed in Volume I on pages IV.C-16 and IV.C-17, the SCAQMD recommends that the lead agency consider modifying the following mitigation measure and consider additional mitigation measures to further reduce construction oxides of nitrogen (NO<sub>x</sub>) and PM10 fugitive dust air quality impacts from the project, if applicable and feasible:

C-4 Site access points must be swept/washed within thirty minutes of visible dirt deposition using SCAQMD Rule 1186 certified street sweepers or roadway washing trucks (recommend water sweepers with reclaimed water).

C-6 All haul trucks hauling soil, sand, and other loose materials must ~~either~~ be covered ~~or maintain two feet of freeboard.~~

#### NO<sub>x</sub> – Recommended Additions:

- Prohibit material delivery heavy-duty truck idling in excess of five minutes.
- Configure construction parking to minimize traffic interference.
- Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow.
- Schedule construction activities that affect traffic flow on the arterial system to off-peak hour to the extent practicable.
- Reroute construction trucks away from congested streets or sensitive receptor areas.
- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site.
- Give preferential consideration to contractors who use clean fuel construction equipment; emulsified diesel fuels; construction equipment that uses low sulfur diesel and is equipped with oxidation catalysts, or other retrofit technologies, etc.

#### PM10 – Recommended Additions:

- Replace ground cover in disturbed areas inactive for ten days or more.
- Apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more).
- Install wheel washers where vehicles enter and exit the construction site onto paved roads or wash off trucks and any equipment leaving the site each trip.
- All streets shall be swept at least once a day using SCAQMD Rule 1186 certified street sweepers or roadway washing trucks or whenever visible

soil materials are carried to adjacent streets (recommend water sweepers with reclaimed water).

- Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 mph.
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation.