



South Coast
Air Quality Management District

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E-mailed: January 4, 2011
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Mr. Patrick Lynch
General Manager
Los Angeles Coliseum Commission
3939 South Figueroa Street
Los Angeles, CA 90037

**Review of the Draft Environmental Impact Report (Draft EIR)
for the Los Angeles Memorial Sports Arena Redevelopment Project**

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are intended to provide guidance to the lead agency and should be incorporated into the final Environmental Impact Report (EIR) as appropriate.

The AQMD staff is concerned about the proposed project's significant air quality impacts resulting from construction related activities. Specifically, the proposed project will exceed the AQMD's CEQA thresholds applicable to oxides of nitrogen (NOX) and volatile organic compounds (VOC's), therefore, the AQMD staff requests that the lead agency minimize or eliminate these impacts in accordance with CEQA Guidelines §15370. Further, AQMD staff requests that the lead agency provide enforceable mitigation to ensure that the proposed project does not result in a net increase of greenhouse gas (GHG) emissions.

Pursuant to Public Resources Code Section 21092.5, please provide the AQMD with written responses to all comments contained herein prior to the adoption of the final EIR. Further, staff is available to work with the lead agency to address these issues and any

questions related to air quality that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,

A handwritten signature in black ink that reads "Ian V. MacMillan". The signature is written in a cursive, slightly slanted style.

Ian MacMillan

Program Supervisor, CEQA Inter-Governmental Review
Planning, Rule Development & Area Sources

Attachment

IM:DG

LAC101116-05
Control Number

Mitigation for Construction Activities

1. Given that the draft EIR demonstrates that regional NOX and VOC criteria pollutant emissions during construction create significant adverse air impacts the AQMD staff recommends that the lead agency require mitigation pursuant to CEQA Guidelines §15370, which could minimize or eliminate these significant impacts. To assist the lead agency with identifying possible mitigation measures for the project, please refer to AQMD's CEQA webpage at the following internet address:
www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.htm. Further, a list of mitigation measures has been provided below.
 - Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow,
 - Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site,
 - Reroute construction trucks away from congested streets or sensitive receptor areas,
 - Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation,
 - Improve traffic flow by signal synchronization, and ensure that all vehicles and equipment will be properly tuned and maintained according to manufacturers' specifications,
 - Use required coatings and solvents with a VOC content lower than required under Rule 1113,
 - Construct/build with materials that do not require painting,
 - Use pre-painted construction materials,
 - Require the use of high-pressure-low-volume (HPLV) paint applicators with a minimum transfer efficiency of at least 50% or other application techniques with equivalent or higher transfer efficiency,
 - Require the use of electricity from power poles rather than temporary diesel or gasoline power generators,
 - Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks, soil import/export, and demolition export), and
 - Require all on-site construction equipment to meet EPA Tier 2 or higher emissions standards according to the following:
 - ✓ Project start to December 31, 2011: All offroad diesel-powered construction equipment greater than 50 hp shall meet Tier 2 offroad emissions standards. In addition, all construction equipment shall be outfitted with the BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 2 or Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
 - ✓ January 1, 2012, to December 31, 2014: All offroad diesel-powered construction equipment greater than 50 hp shall meet Tier 3 offroad emissions standards. In addition, all construction equipment shall be outfitted with

BACT devices certified by CARB. Any emissions control device used by the contractor 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.

- ✓ Post-January 1, 2015: All offroad diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor 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.
- A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.
- Also, the lead agency should consider encouraging construction contractors to apply for SCAQMD "SOON" funds. The "SOON" program accelerates clean up of off-road diesel vehicles, such as heavy duty construction equipment. More information on this program can be found at the following website:
<http://www.aqmd.gov/tao/Implementation/SOONProgram.htm>

Greenhouse Gas Emissions Analysis

2. The lead agency did not quantify GHG emissions from the operation of the proposed project. Further, the lead agency generally concluded that the project's GHG impacts are less than significant because events and attendance at the project site are "within the purview of the existing operations of the sports arena and the coliseum and would not result in an increase in the number of people that attend individual events at the sports arena." AQMD staff disagrees with the lead agency's conclusion that the proposed project will not result in an increase in the seating and vehicle capacity of the existing sports arena as there are no enforceable mechanisms to ensure that GHG emissions will remain at the baseline level. For example, if the new venue proves to be more popular than the existing arena, then annual attendance, and the subsequent VMT and emissions associated with the facility's operations, will not have been accounted for under CEQA. Therefore, the AQMD staff is concerned that the lead agency has not provided performance standards or emission targets to ensure that the proposed project will not impose an increase in the annual number of events held at the project site that could result in a potential net increase in the sports arena's annual GHG emissions. Without specific performance standards or emissions targets there is no enforceable mechanism to actually maintain existing GHG emissions from the proposed project. As the volume of traffic activity generated by the sports arena is considerable the lead agency should either quantify these emissions and compare them to a significance threshold or require enforceable measures that ensure that there is no net increase in GHG emissions.