



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

E-Mailed: November 25, 2014
Darryl.ford@lacity.org

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Mr. Darryl Ford
Los Angeles Department of Recreation and Parks
221 N Figueroa Street, Suite 100
Los Angeles, CA 90012

Notice of Preparation of a CEQA Document for the Hollywood Central Park Project

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. As a follow-up to our comment letter dated September 3, 2014, SCAQMD staff would like to provide the Lead Agency with additional information related to the siting of this Project directly over the Hollywood Freeway and reiterate our concerns regarding the exposure of patrons of the Project to unhealthy levels of air pollution.

The proposed Project will develop and operate an approximately 38-acre park and recreational facility constructed above the Hollywood Freeway on an engineered deck and support structure. The Project would be built in the air space above the Hollywood Freeway and enclose the approximately one-mile below-grade portion of the Hollywood Freeway located between Bronson Avenue and Santa Monica Boulevard. The grade-level land uses are anticipated to include, but not be limited to landscaped open space, multipurpose fields, active and passive pedestrian meadows, small retail facilities and kiosks (e.g., bike shops, seasonal markets, art galleries, etc.), restaurants, an amphitheater, a community center, plazas and terraces, water features, playgrounds, dog parks, and interactive community areas. The Park is anticipated to be open 7 days a week, 24 hours per day, without restrictions to pedestrian movement through the Park. Commercial facilities would generally be open as early as 7:00 a.m. and close by 2:00 a.m.; the Bed and Breakfast Inn would operate 24-hours per day.

While SCAQMD staff understands the desire to develop an open space resource that serves as a focal point for recreation and civic life in the community, we are concerned about a recreational development located in an area with an elevated exposure to diesel particulate emissions. According to Caltrans¹, the segment of the Hollywood freeway which the Project will be located had an annual average daily traffic count of 209,000 vehicles in 2013. The California Air Resources Board's (CARB) *Air Quality and Land*

¹ <http://traffic-counts.dot.ca.gov/>

*Use Handbook: A Community Perspective*², recommends avoiding siting new sensitive land uses (such as residences, schools, daycare centers, playgrounds, or medical facilities) within 500 feet of a freeway with 100,000 vehicles per day.

On October 3, 2014, SCAQMD released the Draft Multiple Air Toxics Exposure Study IV (MATES-IV) to the public for review and comment. MATES-IV found that although diesel particulate matter (PM) exposure decreased by approximately 70%, it still dominates the overall cancer risk from air toxics with the highest risk areas near the ports and transportation corridors.

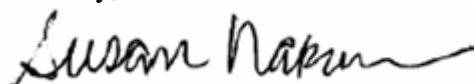
Studies have shown that concentrations of ultrafine particles and black carbon are elevated along highways, with a decrease in concentrations with increasing distance from the highways. Zhu^{3,4}, has conducted multiple studies which found elevated levels of ultrafine particles and black carbon along highways and that those elevated levels decreased with increasing distance from the highway.

Other researchers have investigated the health impacts caused by this exposure. An investigation by Gauderman, et al⁵ found that local exposure to traffic on a freeway has adverse effects on children's lung development, which are independent of regional air quality, and which could result in important deficits in attained lung function in later life. In Southern California, McConnell⁶ et al. found that that children living within 75 meters of a major road was associated with an increased risk of lifetime asthma, prevalent asthma, and wheeze.

Recognizing the many studies which have shown a strong correlation between exposure to diesel PM and reduced lung function and increased respiratory problems, the results in MATES-IV, and the CARB's land use recommendations, SCAQMD staff is concerned about the health risks to the patrons of the proposed Project.

SCAQMD staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact me, at (909) 396-3105, if you have any questions regarding our comments.

Sincerely,



Susan Nakamura
Director, Strategic Initiatives

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² <http://www.arb.ca.gov/ch/handbook.pdf>

³ <http://www.tandfonline.com/doi/pdf/10.1080/10473289.2002.10470842>

⁴ [http://dx.doi.org/10.1016/S1352-2310\(02\)00354-0](http://dx.doi.org/10.1016/S1352-2310(02)00354-0)

⁵ [http://dx.doi.org/10.1016/S0140-6736\(07\)60037-3](http://dx.doi.org/10.1016/S0140-6736(07)60037-3)

⁶ <http://www.jstor.org/discover/10.2307/3651052?uid=3739560&uid=2&uid=4&uid=3739256&sid=21105295879813>