



South Coast Air Quality Management District

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200 N. Spring Street, Room 750
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Draft Environmental Impact Report (Draft EIR) the Proposed Baldwin Hills Crenshaw Plaza Master Plan Project (ENV-2012-1962-EIR)

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 EIR.

In the project description, the Lead Agency proposes to redevelop the existing Baldwin Hills Crenshaw Plaza, which would result in a mixed-use retail, commercial, office, hotel, and residential project totaling approximately 3,082,959 square feet. Approximately 90,898 square existing structures would be demolished. The Proposed Project would result in a net increase of approximately 2,056,215 square feet.

Based on a review of the Draft EIR the Lead Agency determined that the proposed project will result in significant regional air quality impacts during construction, even with the incorporation of mitigation. Specifically, the air quality analysis demonstrated that the proposed project will exceed the SCAQMD's CEQA regional construction significance thresholds for NO_x. Therefore, SCAQMD staff recommends that, pursuant to Section 15126.4 of the CEQA Guidelines, the following measures be included in the Final EIR in addition to the measures proposed by the Lead Agency in order to minimize or eliminate significant adverse air quality impacts.

Recommended Changes

Mitigation Measure B-9: All diesel powered construction equipment in use shall require control equipment that meets at a minimum Tier ~~III~~ IV emission requirements. In the event that Tier ~~III~~ IV equipment is not available, diesel powered construction equipment in use shall require emission control equipment with a minimum of Tier ~~III~~ III diesel standards.

Additional Construction Mitigation Measures

- Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export) and if the Lead Agency determines that 2010 model year or newer diesel trucks cannot be obtained the Lead Agency shall use trucks that meet EPA 2007 model year NOx emissions requirements.
- Consistent with measures that other Lead Agencies in the South Coast Air Basin (including Port of Los Angeles, Port of Long Beach, Metro and City of Los Angeles) have enacted, require all on-site construction equipment to meet the following:
- 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.
- Encourage construction contractors to apply for SCAQMD "SOON" funds. Incentives could be provided for those construction contractors who apply for SCAQMD "SOON" funds. The "SOON" program provides funds to accelerate 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>

For additional measures to reduce off-road construction equipment, refer to the mitigation measure tables located at the following website:

www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html

The SCAQMD staff is available to work with the Lead Agency to address these concerns and any other air quality questions that may arise. Please contact Jack Cheng, Air Quality Specialist at (909) 396-2448, if you have any questions regarding these comments. We look forward to reviewing and providing comments for the Final EIR associated with this project.

Sincerely,

Jillian Wong

Jillian Wong, Ph.D.

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Planning, Rule Development & Area Sources

JW:JC

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