



**South Coast
Air Quality Management District**
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Mr. Sergio Ibarra
Department of City Planning
200 N. Spring St., Room 750
Los Angeles, CA 90012

**Draft Environmental Impact Report (Draft EIR) for the Proposed Martin Expo Town Center
Located at 12101 West Olympic Boulevard, Los Angeles (Case No. ENV-2012-3063-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.

The Project includes 516 residential units (540,200 sf), 67,000 sf of retail floor area, 200,000 sf of creative office floor area, and associated subterranean parking. In the project description, the Lead Agency proposes to demolish 99,399 square feet existing structures, grade and export 200,000 cubic yards and construct approximately 807,200 square feet of mixed use buildings. Both construction and long term operational emissions exceed their respective thresholds. SCAQMD staff has concerns about the analysis performed for this Project, which might have led to an under-estimation of the Project's air quality and health risk impacts. Additional details are included in the attachment.

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 Baker

Jillian Baker, Ph.D.
Program Supervisor
Planning, Rule Development & Area Sources

JB:JC
LAC 141128-11
Control Number
Attachment

Attachment

Air Quality Analysis

1. The Lead Agency determined that during demolition, 8,590 tons of waste material will be generated and 452 haul trips will be required. It is unclear how the Lead Agency determined the number of trips that will be required. The Lead Agency should provide additional information regarding demolition waste removal calculations and revise the Air Quality analysis in the Final EIR, if necessary.
2. In the Methodology – Construction section (Page 4.C-12) of the Draft EIR, the Lead Agency indicates that Phase 3: Grading and Earthwork is expected to take “4.5 months, concurrent with site preparation.” However, Table 3.6 of the Draft EIR and Appendix G – CalEEMod calculations do not demonstrate concurrent/overlapping grading and site preparation emissions. Table 3.6 and Appendix G underestimate the emissions as described in the Methodology – Construction section. SCAQMD staff recommends the Lead Agency revise the Air Quality analysis in the Final EIR to analyze the impacts from overlapping construction phases.
3. In the Project Description of the Draft EIR, the Lead Agency proposes to develop a mixed use commercial and residential building totaling 807,200 square feet. However, Appendix G - CalEEMod calculations only accounts for 796,730 square feet. The total square footage used throughout the Draft EIR is inconsistent and the Lead Agency should update the total square footage analyzed in the Air Quality analysis in the Final EIR.
4. Throughout the CalEEMod calculations (Appendix G), the User Entered Comments & Non-Default Data inputs are inconsistent for the non-mitigated and mitigated scenarios. Section 3.0 Construction Detail has varying grading phase lengths, demolition haul lengths, grading haul lengths, and grading haul trips. For example:

Input Category	Non Mitigated Input Value	Mitigated Input Value
Grading Phase Length (days)	97	119
Demolition Haul Length (miles)	20	35
Grading Haul Length (miles)	20	35
Grading Haul Trips	25,000	14,000

SCAQMD staff recommends the Lead Agency revise the Air Quality analysis and utilize consistent input values in the Final EIR.

5. The nearest sensitive receptors are residential homes approximately 146 meters (480 feet) south of the Project site. According to the Project Description, the maximum area of disturbance is no more than 4.76 acres. Therefore, to be conservative, the Lead Agency should use the mass look up table for a 2-acre site (instead of a 5-acre site) at a 100 meter receptor distance or perform dispersion modeling using AERMOD to analyze the project’s localized impacts from construction. SCAQMD staff recommends the Lead Agency revise the LST analysis in the Final EIR.
6. The proposed haul routes are adjacent to residential areas and might impact sensitive receptors. The Final EIR should analyze and disclose the potential health impacts from diesel particulate matter emitted by trucks along the haul road.

Construction Mitigation Measures

7. Based on the air quality analysis in the Draft EIR, the Lead Agency determined that the proposed Project will result in significant regional air quality impacts during construction. 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:
 - 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 NO_x 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)¹ have enacted, require all on-site construction equipment to meet the following:
 - ✓ All off road 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.
 - ✓ 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/home/programs/business/business-detail?title=off-road-diesel-engines>.
 - Require the use of electricity from power poles rather than temporary diesel or gasoline power generators.
 - Provide temporary traffic controls such as a flag person, during all phases of significant construction activity 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.
 - Limit soil disturbance to the amounts analyzed in the Final EIR.
 - All materials transported off-site shall securely covered.
 - Apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more).
 - Water active sites at least twice daily;

¹ For example see the Metro Green Construction Policy at:
http://www.metro.net/projects_studies/sustainability/images/Green_Construction_Policy.pdf

- Apply water three times daily, or non-toxic soil stabilizers according to manufacturers' specifications, to all unpaved parking or staging areas or unpaved road surfaces;
- Traffic speeds on all unpaved roads to be reduced to 15 mph or less.
- Construct or build with materials that do not require painting.
- Require the use of pre-painted construction materials.

For additional measures to reduce off-road construction equipment, refer to the mitigation measure tables located at the following website: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>.

Mobile Source Emissions - Electric Vehicle (EV) Charging Stations

8. Based on the air quality analysis in the Draft EIR, the Lead Agency determined that the proposed Project will result in significant unavoidable regional air quality impacts during operation. Specifically, the air quality analysis demonstrated that the proposed Project will exceed the SCAQMD's CEQA regional operational significance thresholds for NO_x. Therefore, SCAQMD staff recommends that, pursuant to Section 15126.4 of the CEQA Guidelines, the following measure 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:

Vehicles that can operate at least partially on electricity have the ability to substantially reduce the significant NO_x impacts from this project. 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. Therefore, the SCAQMD staff recommends the Lead Agency require the proposed project to be constructed with the appropriate infrastructure to facilitate sufficient electric charging for vehicles to plug-in. The SCAQMD staff recommends that the Lead Agency require at least 5% of all vehicle parking spaces include EV charging stations. At a minimum, electrical panels should appropriately sized to allow for future expanded use.