



South Coast  
Air Quality Management District

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E-Mailed: December 21, 2011  
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Mr. Sergio Ibarra  
City of Los Angeles, Major Projects  
200 North Spring Street, City Hall, Room 750  
Los Angeles, CA 90012

**Review of the Draft Environmental Impact Report (Draft EIR) for the  
Boyle Heights Mixed Use Community Project**

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

Based on a review of the air quality analysis in the Draft EIR the AQMD staff is concerned about the project's significant localized and regional air quality impacts. Therefore, the AQMD staff recommends that the lead agency provide additional mitigation measures to minimize the project's significant air quality impacts pursuant to Section 15126.4 of the California Environmental Quality Act (CEQA) Guidelines. Details regarding these comments are attached to this letter.

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 other questions 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".

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

Attachment

IM:DG

LAC111025-06  
Control Number

### Construction Equipment Mitigation Measures

1. The lead agency determined that the proposed project will exceed the CEQA localized construction significance thresholds for PM<sub>10</sub> and NO<sub>2</sub> and the regional construction significance thresholds for VOC and NO<sub>x</sub> emissions; therefore, AQMD staff recommends that the lead agency provide the following additional mitigation measures pursuant to CEQA Guidelines Section 15126.4.
  - 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<sub>x</sub> emissions requirements,
  - 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 PM<sub>10</sub> generation,
  - 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, and
  - Contractors shall use 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.

### Operational Air Quality Impacts from Mobile Sources

2. The lead agency's operational air quality analysis demonstrates significant operational air quality impacts from criteria pollutant emissions (i.e., NO<sub>x</sub>, CO, VOC, PM<sub>10</sub> and PM<sub>2.5</sub>) in an area that already exceeds state and federal ambient air quality standards. A substantial portion of these impacts are from mobile source emissions related to vehicle trips associated with the proposed project. Based on the traffic impact analysis summarized in chapter four of the Draft EIR the lead agency determined that the proposed project will result in significant traffic impacts from additional trips generated by the proposed project. Specifically, these impacts will occur at some of the most highly congested intersections surrounding the project site. For example, the lead agency determined that the project will significantly impact the Soto Street and Olympic Boulevard Intersection (identified as Intersection 46). As a result, the AQMD staff is concerned that in addition to regional air quality impacts these significantly impacted traffic intersections could contribute to cumulative local air quality impacts that have not been addressed in the Draft EIR.

The arterial streets that surround the project site are highly used by truck traffic and passenger vehicles traveling from major freeways (i.e., Interstate -10, Interstate -5,

101-Freeway and 60-Freeway) to industrial areas south of the project site based on Table 7 of the Traffic Study (Appendix L) of the Draft EIR. Therefore, the AQMD staff is concerned that additional congestion could result in the dispersion of traffic (i.e., passenger vehicles and diesel trucks) to local neighborhood roads that provide access to worker and industrial destinations. This type of traffic activity could result in additional local air quality impacts to residents. Also, the lead agency has expressed uncertainty in the effectiveness of the neighborhood intrusion mitigation if the program cannot achieve consensus among community members and stakeholders (Page IV-K-108).

Further, the project does not appear to maximize opportunities to reduce regional air quality impacts given that the additional traffic combined with impediments to active transportation (such as reduced sidewalk widths, a lack of bicycle amenities, etc.) could discourage pedestrian activity needed to maximize the use of mass transportation by residents. The lead agency only requires a single non-quantifiable mitigation measure that encourages delivery trips during off-peak traffic periods (i.e., Mitigation Measure B.1-10) to reduce mobile sources emissions. Additional mitigation measures should be included to discourage truck travel in residential neighborhoods, such as enforcement mechanisms to restrict truck parking and truck routes. In addition, the AQMD staff recommends that at a minimum the lead agency reduce the project's significant operational air quality impacts by reviewing and incorporating additional transportation mitigation measures, such as those from the greenhouse gas quantification report published by the California Air Pollution Control Officer's Association in the Final EIR<sup>1</sup>.

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<sup>1</sup> California Air Pollution Control Officer's Association. August 2010. Quantifying Greenhouse Gas Mitigation Measures. Accessed at: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>