



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Draft Environmental Impact Report (Draft EIR) for the Proposed Rancho Cienega Celes King III Pool Demolition Project (SCH No.: 2018061048)

South Coast Air Quality Management District (South Coast AQMD) 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.

South Coast AQMD Staff's Summary of Project Description

The Lead Agency proposes to demolish the existing Celes King III Pool and associated structures, infill the pool pit, grade the site, and install utilities, a playground, and shade structures on 0.4 acres (Proposed Project). The Proposed Project would export 14,000 cubic yards (cy) of demolition debris and import 1,519 cy of material¹. The Proposed Project is located at 5001 Obama Boulevard on the northeast corner of Obama Boulevard and West Martin Luther King Jr. Boulevard in the community of West Adams-Baldwin Hills-Leimert. Construction of the Proposed Project is expected to occur over 12 months, beginning in December 2020².

South Coast AQMD Staff's Summary of Air Quality

In the Air Quality Analysis section, the Lead Agency quantified the Proposed Project's construction emissions and compared those emissions to South Coast AQMD's recommended regional and localized air quality CEQA significance thresholds for construction. Because equipment used for the demolition and construction activities for another project, Phase I of the Rancho Cienega Sports Complex Project (SCH No.: 2016031012)³, would already be on site, and Tier 4 Final construction equipment was required per Mitigation Measure AQ-1 for that project, the Lead Agency assumed the use of Tier 4 Final construction equipment for this Proposed Project to quantify the Proposed Project's construction emissions⁴. Subsequently, the Lead Agency found that the Proposed Project's construction emissions would not exceed South Coast AQMD's regional or localized air quality CEQA significance thresholds.

¹ Draft EIR. Page 2-6.

² *Ibid.*

³ Governor's Office of Planning and Research. CEQAnet Web Portal. Searched May 7, 2019. Accessed at: <https://ceqanet.opr.ca.gov/Project/2016031012>. Based on a search, South Coast AQMD staff found that the Lead Agency adopted a Mitigated Negative Declaration and filed a Notice of Determination for the Rancho Cienega Sports Complex Project on December 20, 2016.

⁴ Draft EIR. Page 3.1-18.

South Coast AQMD Staff's Comments*Enforceability of Tier 4 Final Construction Equipment*

South Coast AQMD staff recommends that the Lead Agency include Tier 4 Final construction equipment as an express requirement for the Proposed Project in the Final EIR to be consistent with the air quality modeling assumption. As stated above, the Tier 4 Final construction equipment was a modeling assumption used in CalEEMod to calculate the Proposed Project's construction emissions as substantial evidence to support the findings that the Proposed Project's regional and localized construction emissions would be less than significant. While it is reasonable to assume that Tier 4 Final construction equipment would be available since they are already on-site for the other project, using Tier 4 Final construction equipment is not enforceable unless the Lead Agency expressly requires the use. Therefore, to ensure that Tier 4 Final construction equipment will be used during the entire 12-month construction period for the Proposed Project, and to be consistent with the modeling assumption, South Coast AQMD staff recommends that the Lead Agency include the use of Tier 4 Final construction equipment as a project design feature or a mitigation measure in the Air Quality Section of the Final EIR and include this requirement for Air Quality in the Mitigation Monitoring and Reporting Program (MMRP). The Lead Agency should also include this requirement in applicable bid documents, and that successful contractor(s) must demonstrate the ability to supply compliant equipment prior to the commencement of any construction activities. A copy of each unit's certified tier specification and California Air Resources Board (CARB) or South Coast AQMD operating permit (if applicable) should be available upon request at the time of mobilization of each applicable unit of equipment. Moreover, the Lead Agency should require that the Proposed Project maintain records of all off-road construction equipment at the Proposed Project and make these records available to the Lead Agency upon request. These records will serve as substantial evidence to prove that the Proposed Project utilized off-road construction equipment that meets the Tier 4 emissions standards. The Lead Agency should require periodic reporting and provision of written documentation by contractors to ensure compliance, and conduct regular inspections to the maximum extent feasible to ensure compliance with this requirement.

Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), South Coast AQMD staff requests that the Lead Agency provide South Coast AQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and to the public who are interested in the Proposed Project. South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Robert Dalbeck, Assistant Air Quality Specialist, at RDalbeck@aqmd.gov or (909) 396-2139, should you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

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Planning, Rule Development & Area Sources

LS:RD

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