



South Coast Air Quality Management District

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Mr. Kim Szalay, Project Planner
County of Los Angeles
Department of Regional Planning
Special Projects Section, Room 1362
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**Review of the Draft Environmental Impact Report (Draft EIR) for the Proposed
Entrada South Project (SCH NO. 2010071004; County Project No. 00-210-(5); ER
Review No. 200400096; and Tentative Tract Map No. TR53295)**

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, as appropriate.

Based on the project description, the lead agency proposes to construct a mixed-use community on approximately 501.4 acres that will include up to 339 single-family residences, 1,235 multi-family units, 730,000 square feet of commercial uses (435,000 square feet of office uses and approximately 295,000 square feet of commercial uses); an elementary school; a public neighborhood park; open space; two private recreational centers; and a 27.2-acre Spineflower Preserve. Soil disturbance activities will involve approximately 7.8 million cubic yards of existing material balanced onsite. Remedial grading would involve, as needed, an additional two million cubic yards of soil. Construction will take approximately nine years beginning in 2015 with actual development of the proposed land uses based on market conditions. Based on the projected occupancy starting in 2018, construction and operational air quality impacts will overlap in 2018 until project buildout in 2024.

The SCAQMD staff recommends that overlapping construction and operational air quality impacts starting in 2018 through 2024 be estimated, compared with the recommended SCAQMD long-term operational thresholds of significance, and then included in the FEIR. Further, compliance with SCAQMD rules concerning Volatile Organic Compound emissions found during soil disturbance and nuisance odors should be included in the FEIR. Finally, because the lead agency has determined that project air quality impacts exceed the SCAQMD recommended daily significance thresholds for regional air quality impacts for construction and operations, the SCAQMD recommends additions to the mitigation measures proposed by the Lead Agency in the Draft EIR. Details are included in the attachment.

Mr. Kim Szalay,
Project Planner

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Pursuant to Public Resources Code Section 21092.5, SCAQMD staff requests that the lead agency provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the FEIR. Further, staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist CEQA Section, at (909) 396-3302, if you have any questions regarding the enclosed comments.

Sincerely,

Jillian Wong

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JW:GM

LAC150430-08
Control Number

Air Quality Analysis

Overlapping Construction and Operation Activities

1. In the Draft EIR, project construction is planned to start in 2015 with project occupancies anticipated to begin in 2018 reaching buildout in 2024.¹ Construction activities would occur for up to nine years with the project being built out in phases or all at once.² That would create the situation with on-going construction continuing while portions of the project becoming operational causing construction and operation air quality impacts to overlap. If construction and operational phases will overlap, the construction activity could contribute more PM10 fugitive dust emissions to the combined total emissions with the remaining emissions, i.e., NOx, CO, SOx and PM10 (exhaust) sources being contributed from both short and long term activities substantially increasing total project emissions. The SCAQMD therefore recommends that the Lead Agency determine the worst-case construction and operational daily air quality impact scenario; total the construction and operational emission estimates together; and then compare those totals with the SCAQMD operational daily significance thresholds in the Final EIR. The reasoning is that the proposed nine year construction period is a long period of time making the project emissions overlapping from 2018-2024 with project occupancies seemingly more long-term in nature. Therefore, the use of the operational daily significance thresholds approach would be more conservative than separating the emissions and comparing the short- and long-term estimates to the respective SCAQMD recommended daily significance thresholds.

Potential VOC Emissions From Soil Disturbance and Odors

2. In the Project Description, the Lead Agency describes site preparation activities that will include substantial amounts of soil disturbance that will be balanced onsite.³ Based on the existing setting, the project site includes abandoned oil wells⁴ that could potentially result in the release of Volatile Organic Compound emissions (VOCs) and odors during soil disturbance activities. Although different SCAQMD rules and regulations are mentioned throughout the Draft EIR and a discussion of potential odor impacts is included in the Air Quality Section on Page 5.3-45, the Lead Agency should also include in the FEIR how the proposed project will comply with SCAQMD Rules 1166 - Volatile Organic Compound Emissions from Decontamination of Soil and Rule 402 – Nuisance should VOCs or odors be encountered during soil disturbance.

¹ Table 5.3-4 Project Regional Construction Emissions, Page 5.3-36 (Air Quality Section); and Page 5.20-36 (Transportation/Traffic Section).

² Project Description, Page 3.0-19.

³ 7.8 million cubic yards plus an additional two million cubic yards for regrading.

⁴ Air Quality Section 5.3, Page 5.3-26.

Recommended Additional Mitigation Measures

Construction

3. In the Draft EIR, the Lead Agency has determined that Project impacts exceed the SCAQMD recommended daily significance thresholds for regional construction air quality impacts for NO_x and VOC, as well as for regional operations for VOC, NO_x, CO, PM₁₀ and PM_{2.5}. Pursuant to CEQA Guidelines §15126.4, the SCAQMD staff recommends that the following mitigation measures be incorporated into the Proposed Project FEIR to reduce project adverse air quality impacts in addition to the measures included in the Air Quality Section of the Draft EIR.

Measures Directed to Reduce NO_x from Construction Equipment:

- Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export, as applicable).
- Consistent with measures that lead agencies in the region (including Port of Los Angeles, Port of Long Beach, Metro and City of Los Angeles)⁵ have enacted, require all on-site construction equipment to meet EPA Tier 3 or higher emissions standards according to the following:
 - ✓ Post-January 1, 2015: 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/soon/>

⁵ For example see the Metro Green Construction Policy at:
http://www.metro.net/projects_studies/sustainability/images/Green_Construction_Policy.pdf

Additional NOx Measures:

- Use street sweepers that comply with SCAQMD Rules 1186 and 1186.1.
- Use electricity from power poles rather than temporary diesel or gasoline power generators.
- Reroute construction trucks away from congested streets or sensitive receptor areas.

Additional mitigation measures to reduce off-road construction equipment can be located at the SCAQMD website.⁶

Measures Directed to Reduce VOC During Construction:

- Construct or build with materials that do not require painting or use pre-painted construction materials.
- Use coatings and solvents with a VOC content lower than required under Rule 1113.

Operations

Additional Operational Mitigation Measures - Energy Efficiency⁷

- Maximize use of solar energy including solar panels; installing the maximum possible number of solar energy arrays on the building roofs and/or on the Project site to generate solar energy for the facility.
- Require all lighting fixtures, including signage, to be the most energy efficient possible, require that new traffic signals have light-emitting diode (LED) bulbs, and require that light fixtures be energy efficient compact fluorescent and/or LED light bulbs. Where feasible use solar powered lighting.
- Use light colored paving and roofing materials.
- Use passive heating, natural cooling, solar hot water systems, and reduced pavement.
- Maximize the planting of trees in landscaping and parking lots.
- Limit the hours of operation of outdoor lighting needed for safety and security.
- Utilizing only Energy Star heating, cooling, and lighting devices, and appliances.
- Install light colored “cool” roofs and cool pavements.
- Require the use of electric/energy efficient appliances (e.g. stoves).
- Require use of electric or alternatively fueled sweepers with HEPA filters.
- Use of water-based or low VOC cleaning products.

⁶ <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>

⁷ See also California Green Building Standards Code California Code of Regulations at: http://www.ecodes.biz/ecodes_support/Free_Resources/2013California/13Green/13Green_main.html 2013 Green Building Standards Code .

Additional Operational Mitigation Measures – Transportation

- Provide electric car charging stations for residents (not just electric vehicle wiring per local ordinance). Also, provide designated areas for parking of zero emission vehicles (ZEVs) for car-sharing programs.
- Create local “light vehicle” networks, such as neighborhood electric vehicle (NEV) systems.