



# South Coast Air Quality Management District

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E-mailed: May 13, 2010  
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## **Review of the Recirculated Draft Environmental Impact Report (Draft EIR) for the Landmark Village Project**

South Coast Air Quality Management District (AQMD) staff appreciates the lead agency providing opportunity to comment on the above-mentioned document, and providing AQMD staff with an extended review period. AQMD staff notes that the lead agency has indicated that it will accept comments after the close of the comment period (February 1, 2010 to March 17, 2010) given that a copy of the Recirculated Draft EIR was not provided to the AQMD until March 25, 2010. Pursuant to Public Resources Code (PRC) 15082 and 15086, please ensure that AQMD receives a copy of all future CEQA documents from your agency that may affect air quality. The following comments are intended to provide guidance to the lead agency and should be incorporated into the Final Environmental Impact Report (Final EIR).

AQMD staff is concerned that the air quality analysis does not appear to have been updated with current methodologies since it was last analyzed in May 2006 (as indicated in the technical appendices in the Recirculated Draft EIR). As a result, it is unclear if air quality impacts have been accurately presented in the Recirculated Draft EIR. In addition, air quality impacts may have been underestimated as truck trip travel lengths appear to be too low for the potential warehousing operations described for this project. As a result, AQMD staff recommends that the lead agency update the air quality analysis in the Final EIR to present a more accurate description of potential impacts. Lastly, as the lead agency has concluded that some air quality impacts are significant, enforceable mitigation measures that can reduce the magnitude of these impacts should be further evaluated in the Final EIR. Further details are described in the attached comments.

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". The signature is written in a cursive style with a large, stylized 'I' and 'M'.

Ian MacMillan

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

Attachment

IM:DG

LAC100330-02  
Control Number

### Air Quality Modeling Software Outdated

1. The lead agency quantified construction and operational air quality impacts from the proposed project using the URBEMIS2002 Model, however, the URBEMIS2002 Model was updated to the URBEMIS2007 Model and available for use as of June 2007. The URBEMIS2007 Model uses the latest emission factors for on-road and off-road mobile sources. Since the lead agency quantified the project's potential criteria and greenhouse gas (GHG) emissions using the URBEMIS2002 Model AQMD Staff is concerned that the lead agency may have underestimated the project's potential regional air quality and global climate change impacts. To adequately evaluate these impacts, AQMD staff requests that the lead agency quantify all construction and operation emissions using the URBEMIS2007 Model and revise the Re-Circulated Draft EIR to reflect any new emissions values. Further, the lead agency should compare the revised emissions values to the applicable significance thresholds to demonstrate the project's level of significance for air quality and climate change impacts.
2. The lead agency took the daily emissions derived from the URBEMIS modeling described above and calculated emission rates for use the Health Risk Assessment modeling with ISCST3 software. On December 9, 2006, the US EPA promulgated AERMOD as a replacement for ISCST3 as the recommended dispersion model. AQMD staff recommends that the lead agency update the construction related HRA modeling analysis using AERMOD in the Final EIR. Guidance regarding air quality analyses using AERMOD is available on the AQMD website.<sup>1</sup>

### Operational Emissions Calculations

3. In Section 4.9 (Air Quality) and Section 4.23 (Global Climate Change) of the Draft EIR the lead agency assesses the regional air quality and global climate change impacts from the proposed construction and operational activities. Based on staff's review of the URBEMIS output sheets in Appendix 4.9C of the Air Quality Impact Analysis, the lead agency used a commercial trip length of 5.5 miles for customer trips to commercial projects ranging between ten (10) and thirty (30) acres in size. As specified on page 1.0-11, these commercial projects may include warehouse distribution centers.

Based on similar warehouse projects reviewed by the AQMD, the standard trip length that is applied to such projects is 40 miles per one-way trip. The rationale for this trip length is that most vehicle trips to and from warehouse facilities are made by heavy-duty trucks hauling consumer goods, often from the Ports of Long Beach and Los Angeles (POLA and POLB) to destinations outside of California. Thus, a commercial trip length of 5.5 miles would not be representative of haul truck activities at these types of facilities and, therefore could lead to an underestimation of on-road mobile source emissions. Therefore, AQMD staff recommends that the lead agency recalculate the mobile source emissions using actual fleet characteristics based on a reasonable worst case of the project's anticipated commercial operations. The mobile source criteria pollutant and GHG emissions calculations should account

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<sup>1</sup> [www.aqmd.gov/smog/metdata/AERMOD\\_ModelingGuidance.html](http://www.aqmd.gov/smog/metdata/AERMOD_ModelingGuidance.html) and [www.aqmd.gov/ceqa/hdbk.html](http://www.aqmd.gov/ceqa/hdbk.html)

for the project's applicable trip lengths (miles per one-way trip) within the South Coast Air Basin and up to the California border, respectively.

Once the lead agency has recalculated the mobile source emissions to reflect a more appropriate trip length the AQMD staff requests that the lead agency revise Tables 4.9-24 and 4.23-4 in the Final EIR, quantifying peak daily air quality impacts and summarizing all emissions from the planned operational activities including NO<sub>x</sub>, SO<sub>x</sub>, CO, PM<sub>10</sub>, PM 2.5, VOC and CO<sub>2e</sub>.

#### Construction Equipment Mitigation Measures

4. Given that the lead agency's regional construction air quality analysis demonstrates that the criteria pollutant emissions exceed the AQMD's daily significance thresholds for NO<sub>x</sub>, VOC, CO, and PM<sub>10</sub> the AQMD recommends that the lead agency consider adding the following mitigation measures to further reduce air quality impacts from the project, if feasible:

- ❖ Configure construction parking to minimize traffic interference,
- ❖ Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site,
- ❖ Reroute construction trucks away from sensitive receptor areas,
- ❖ Improve traffic flow by signal synchronization,
- ❖ Pave road and road shoulders, and
- ❖ Consistent with measures that other lead agencies in the region (including POLA and POLB) have enacted, require all on-site construction equipment to meet EPA Tier 2 or higher emissions standards according to the following:
  - ✓ April 1, 2010, to December 31, 2011: All offroad diesel-powered construction equipment greater than 50 hp shall meet Tier 2 offroad emissions standards. In addition, all construction equipment shall be outfitted with the 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 2 or Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
  - ✓ January 1, 2012, to December 31, 2014: All offroad diesel-powered construction equipment greater than 50 hp shall meet Tier 3 offroad emissions standards. 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.

- ✓ Post-January 1, 2015: All offroad 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 AQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.
- ❖ 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](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html).
- ❖ The lead agency should consider encouraging construction contractors to apply for AQMD "SOON" funds. As an example, incentives could be provided in the bidding process for those construction contractors who apply for AQMD "SOON" funds. The "SOON" program provides up to \$60 million dollars 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>

Warehouse/Distribution Center Mitigation Measures:

4. The AQMD recommends that the lead agency consider adding the following mitigation measures to further reduce air quality impacts from the operation phase of the project, if feasible:
  - ❖ Design warehouse/distribution centers such that entrances and exits discourage that trucks from traversing past neighbors or other sensitive receptors;
  - ❖ Design warehouse/distribution centers such that any check-in point for trucks is well inside the facility property to ensure that there are no trucks queuing outside of the facility;
  - ❖ Develop, adopt and enforce truck routes both for entering and leaving the city and in and out of facilities; keeping in mind common pedestrian routes, especially for schools;
  - ❖ Establish area(s) within the facility for repair needs;
  - ❖ Have truck routes clearly marked with trailblazer signs, so trucks will not enter residential areas;

- ❖ Identify or develop secure locations outside of residential neighborhoods where truckers that live in the community can park their truck, such as a Park & Ride;
- ❖ Provide food options, fueling, truck repair and/or convenience stores on warehouse/distribution center sites to minimize the need for trucks to traverse through residential neighborhoods;
- ❖ Re-route truck traffic by adding direct off-ramps for the truck or by restricting truck traffic on certain sensitive routes;
- ❖ Improve traffic flow by signal synchronization;
- ❖ Require or provide incentives for diesel particulate traps that meet CARB certified level 3 requirements; and
- ❖ Electrify service equipment at facilities.

“Feasible Mitigation”

5. In addition to the construction and operation mitigation measures recommended above the AQMD staff is concerned that many of the mitigation measures proposed by the lead agency are qualified by the statement “if found applicable and feasible.” Specifically, AQMD staff is concerned that integrating this provision with mitigation measures may reduce the overall effectiveness of the proposed measure. Therefore, AQMD staff recommends that the lead agency provide performance criteria to assist the project applicant in making a feasibility determination for applying project specific mitigation measures during the construction and operational phase of the proposed project.