



South Coast Air Quality Management District

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Review of the Draft Environmental Impact Report (Draft EIR) for the LAX Northside Plan Update Project

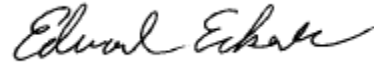
The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The following comment is intended to provide guidance to the Lead Agency and should be incorporated into the revised Draft Environmental Impact Report (EIR) or Final EIR as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

Based on a review of the air quality analysis in the Draft EIR the SCAQMD staff is concerned that the potential health risk impacts from the proposed project are underestimated due to incorrect identification of receptors surrounding the project site. Also, the SCAQMD staff is concerned that the air dispersion modeling analysis used to identify the project's localized Nitrogen Dioxide (NO₂) impacts does not clearly demonstrate consistency with EPA approved methodologies. Therefore, the SCAQMD Staff recommends that the Lead Agency revise the health risk assessment (HRA) and air dispersion modeling analysis to address these concerns. Further, the SCAQMD staff recommends that the lead agency provide additional mitigation measures to minimize the project's significant regional construction and operational 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 SCAQMD 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 cursive script that reads "Ed Eckerle".

Ed Eckerle
Program Supervisor
Planning, Rule Development & Area Sources

Attachment

EE:DG

LAC140521-04
Control Number

Health Risk Assessment

1. Based on the Excel file HRA Outputs.xls provided to the SCAQMD staff on a USB drive, the worker receptor with the highest carcinogenic health risk impact from operations, and construction and operation together is located at 369300 m, 3758000 m, Zone 11. However, based on Figure 6 of Appendix C of the Draft EIR and on Google Maps with imagery dated April 17, 2013, the property at this coordinate is an apartment complex. The carcinogenic health risk from the proposed project reported to this receptor is presented as 1.5 in one million in Table 4.2-12. The same table lists the carcinogenic health risk to the resident as 1.1 in one million. Since health risk estimates for workers are typically lower than residential receptors because of differences in exposure duration, it appears that the apartment complex should be presented as the residential maximum individual cancer risk (MICR). Carcinogenic health risk values for this receptor should be estimated using residential health risk factors (e.g., breathing rate and exposure values) and correct annual concentration adjustment factor (AFann) and compared to carcinogenic health risk from other residential receptors to ensure that the residential MICR is correctly reported in the Final EIR. See comment # 2 below for additional details.
2. Table 19 in Appendix C of the Draft EIR shows that during construction an AFann factor of one (1) was used for residential and sensitive receptors and 4.20 for worker receptors. Based on the input files provided to SCAQMD staff on a USB drive (e.g., LAX Construction Vol XQ ALL METDATA.ami) variable emission factors were used to limit emissions to between 8:00 am and 4:00 pm, Monday through Saturday. Based on Table 2C of the SCAQMD Permit Application Package "L", Revised July 11, 2008, the AFann for a source operation eight hours per day, six days per week should be 3.5. Therefore, the operational carcinogenic health risk to residential and sensitive receptors is under estimated. The health risk from construction should be recalculated with an AFann of 3.5 for residential, sensitive and worker receptors in the Final EIR.
3. Health risk values (i.e, carcinogenic health risk, non carcinogenic hazard indices, cancer burden) were estimated within Access. Because no documentation was provided on the sources of tables and queries used were provided, verification of health risk values generated is very difficult and time consuming. The Final EIR and all future projects with analysis prepared with Access should include detailed documentation that identifies the source of data in tables (spreadsheets, output files, etc.), the units of variables (e.g., (ug/m3)/(1 g/s), lb/day, etc.) manipulation of data using queries, etc.
4. Table 19 in Appendix C of the Draft EIR shows that during operation an AFann of 1.00 was used for residential and sensitive receptors exposed over a 24-hour period and 4.20 was used for workers exposed over a 24-hour period. Since all variable emission factors are one in the input files provided to SCAQMD staff on a USB drive (e.g., LAX Operational XQ ALL METDATA.ami), 1.0 should be used for all receptors (residential, sensitive and worker). Since using an AFann of 4.20 for operational workers is conservative, no change would be required to this EIR. This information is provided for correction in future projects by the Lead Agency.

Evaluation of Health Risk Impacts from the Airport on the Proposed Project

5. The Lead Agency determined that a maximum acute non-cancer health hazard index (HI) of 3.0 identified in the LAX Specific Plan Amendment Study (SPAS) Final EIR would occur at the northern border of the project site (see page 4.2-45 of the Draft EIR). The aforementioned non-cancer HI of 3.0 is primarily a result of elevated acrolein emissions from aircraft activity within the SPAS project site. Therefore, it is likely that the acute non-cancer HI impacts from the LAX SPAS project combined with the proposed uses for the LAX Northside Plan would exceed 1.0 within the project site (i.e., within the Northside Plan Area). As a result, the Lead Agency should identify areas within the project boundary that would cumulatively exceed an acute non-cancer HI of 1.0 in the Final EIR. Also, health risk impacts to the proposed project site should also be updated with other data (e.g., TAC emitting facilities identified in Figure 9 of Appendix C of the Final EIR for the proposed project).

Air Dispersion Modeling

6. Page 15 of Appendix C of the Draft EIR states that NO₂ impacts were estimated using the ambient ratio method with a NO₂ to NO_x conversion ratio of 0.08 for the 1-hr NO₂ impacts and 0.75 for the annual NO₂ impact. The AERMOD input files included on the USB drive provided to SCAQMD staff list the pollutant modeled as OTHER. As a result, it appears that NO₂ emissions were estimated in post processing by multiplying NO to NO₂ ambient concentrations using maximum 1-hour or annual concentrations generated by AERMOD. Therefore, the Final EIR should include detailed information on how concentrations were developed. The analysis in the Draft EIR was prepared using AERMOD v12060 dated 08/18/12, which included build-in NO to NO₂ conversion routines. If NO₂ concentrations were estimated using post-processed NO to NO₂ conversion, the Final EIR should demonstrate that the method used was either consistent with EPA approved methodologies or generates NO₂ concentrations that are as conservative as EPA methodologies.

Further, unitary emissions rates were modeled with AERMOD and pollutant concentrations were estimated by post processing (i.e., multiplying the resultant concentrations by the actual emission rates) using Access. No documentation on the origins of information in tables or on the queries used to complete the post processing was included. Verification of concentrations generated without documentation is very difficult and time consuming. The Final EIR and all future projects with analysis prepared with Access should include detailed documentation that identifies the source of data in tables (spreadsheets, output files, etc.), the units of variables (e.g., (ug/m³)/(1 g/s), lb/day, etc.) manipulation of data using queries, etc.

Operational Mitigation Measures

7. The Lead Agency determined that the proposed project will exceed the CEQA regional operational significance thresholds for NO_x and VOC emissions; therefore, SCAQMD staff recommends that the Lead Agency provide the following additional mitigation measures pursuant to CEQA Guidelines Section 15126.4.

Transportation

- a) Provide actual electric vehicle charging stations (not just wiring infrastructure).

- b) Provide incentives to encourage public transportation.
- c) Create local “light vehicle” networks, such as neighborhood electric vehicle systems.
- d) Require the use of 2010 compliant diesel trucks, or alternatively fueled, delivery trucks (e.g., food, retail and vendor supply delivery trucks) at commercial/retail sites upon project build-out. If this isn’t feasible, consider other measures such as incentives, phase-in schedules for clean trucks, etc.

Energy Efficiency

- e) Maximize the 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 (not just wiring infrastructure).
- f) Require all lighting fixtures, including signage, to be state-of-the art and energy efficient, and 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.
- g) Maximize the planting of trees in landscaping and parking lots.
- h) Use light colored paving and roofing materials.
- i) Use passive heating, natural cooling, solar hot water systems, and reduced pavement.
- j) Utilize only Energy Star heating, cooling, and lighting devices, and appliances.
- k) Install light colored “cool” roofs and cool pavements.
- l) Limit the use of outdoor lighting to only that needed for safety and security purposes.

Other

- m) Require use of electric lawn mowers and leaf blowers.
- n) Require use of electric or alternatively fueled sweepers with HEPA filters.
- o) Require use of water-based or low VOC cleaning products.

Construction Mitigation Measures

8. The Lead Agency determined that the proposed project will exceed the CEQA construction significance threshold regionally for NO_x and VOC’s; therefore, SCAQMD staff recommends that the Lead Agency provide the following additional mitigation measure pursuant to CEQA Guidelines Section 15126.4.
- a) Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks) 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.
 - b) Construct or build with materials that do not require painting.

Further, based on page 4.2-49 of the Draft EIR it appears that the Lead Agency is committed to including Tier 4 engines during construction, however, SCAQMD staff recommends that the Lead Agency provide additional discussion that explicitly identifies this mitigation measure. Specifically, the SCAQMD staff recommends that the Lead Agency include the following:

- c) During project construction, all internal combustion engines/construction, equipment operating on the project site shall meet EPA-Certified Tier 3 emissions standards, or higher according to the following:
- ✓ Project start, 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 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/tao/Implementation/SOONProgram.htm>