



South Coast Air Quality Management District

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Review of the Draft Environmental Impact Report (DEIR) for the LAX Landside Access Modernization Project (LAMP)

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are intended to provide guidance to the Lead Agency and should be incorporated into the Final EIR.

Based on a review of the DEIR's air quality analyses for the proposed LAX Landside Access Modernization Project (LAMP), the SCAQMD staff has the following comments:

Overlapping Project Phase 1 Regional Operation and Phase 2 Construction Emissions

Based on the proposed phasing schedule, Phase 1 operation emissions will be generated starting between years 2023-2024. These emissions will overlap with emissions generated during the Project's Phase 2 construction planned to start in 2025 and end in 2035.¹ Therefore, SCAQMD staff recommends combining these overlapping emissions and comparing them with the SCAQMD's operational thresholds of significance in the Final EIR.

SCAQMD as a Responsible Agency

Since SCAQMD permits will be required, the Final EIR should identify the SCAQMD as a responsible agency. Based on the project description, gasoline fueling equipment is planned for use in the proposed Consolidated Rental Car Facility (CONRAC). The applicable air quality analyses and health risk assessment in the Final EIR should be revised to include fueling equipment emissions generated during operations in order to account for those project emissions and health impacts. For permit questions, please contact SCAQMD Engineering staff at (909) 396-2551.

In addition, concrete batch plant and rock crushing equipment will be used during construction of the proposed LAMP. If permit modifications are required, the Lead Agency should be aware that the SCAQMD permits will include emission limits consistent with what was analyzed in the Final EIR. Permit questions can be directed to SCAQMD Engineering staff at (909) 396-2504.

¹ For analysis purposes, the air quality and other related studies analyzed impacts through Year 2030.

Recommended Change to Construction Mitigation Measure MM-1e:

Because the Lead Agency has determined that Project construction emissions will exceed the SCAQMD recommended daily construction threshold for Oxides of Nitrogen (NOx), the SCAQMD staff recommends the following change to Mitigation Measure Number 1e:²

“All diesel-fueled equipment used for construction will be outfitted with the best available emission control devices, where technologically feasible, primarily to reduce emissions of diesel particulate matter (PM), including fine PM (PM2.5), and secondarily, to reduce emissions of NOx. This requirement shall apply to diesel-fueled off-road equipment (such as construction machinery), diesel-fueled on-road vehicles (such as trucks), and stationary diesel-fueled engines (such as electric generators). (It is unlikely that this measure will apply to equipment with Tier 4 engines.) The emission control devices utilized in construction equipment shall be verified or certified by California Air Resources Board or US Environmental Protection Agency for use in on-road or off-road vehicles or engines. For multi-year construction projects, a reassessment of equipment availability, equipment fleet mixtures, and best available emissions control devices shall be conducted annually. ~~to determine what constitutes a best available emissions control device.~~”

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 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 Gordon Mize, Air Quality Specialist CEQA Section, at (909) 396-3302, if you have any questions regarding the enclosed comments.

Sincerely,

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JW:HH:JC:GM

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²DEIR, Page 4.2-54, Table 4.2.1-23 Construction-Related Air Quality Control Measures.