



South Coast
Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

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March 27, 2009

Ms. Monica Born, P.E., Project Director
Exposition Metro Line Construction Authority
707 Wilshire Boulevard, 34th Floor
Los Angeles, CA 90017

**Draft Environmental Impact Report (Draft EIR) for the Proposed Exposition
Corridor Transit Project Phase II**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. SCAQMD staff supports the use of electric rail to reduce transportation related air pollution impacts. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final Environmental Impact Report.

SCAQMD staff is concerned that the Draft EIR lacks sufficient detail in the project description, specifically with operational activities at the maintenance yard. It appears that the Draft EIR did not analyze air quality impacts from the maintenance yard. In addition, the SCAQMD staff identified, as outlined in the attachment, a number of inconsistencies between project description and the construction air quality analysis that needs to be addressed in the Final EIR.

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 Environmental Impact Report. The SCAQMD staff would be happy 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 these comments.

Sincerely,

A handwritten signature in black ink that reads "Susan Nakamura".

Susan Nakamura
Planning & Rules Manager

Attachment
SN:JK:GM

LAC090128-02
Control Number

Project Description

1. The project description in the Draft EIR lacks sufficient detail for SCAQMD staff to determine if the construction activities and equipment in the air quality analysis are consistent with the project objectives. The operations at the maintenance facility (e.g., service activities, vehicle trips, are maintenance vehicles also electric, etc.) are not provided in enough detail for air quality analysis evaluation. The Final EIR should include a sufficient detail to evaluate the air quality impacts (CEQA Guidelines §§15124(c) and 15147)

Air Quality Analysis - Construction Emissions

1. On page 6 of the Final Draft Air Quality (Air Quality Study by PBS&J - January 2009) in the Draft EIR, the lead agency includes the estimated 125,000 square feet (about 3.8 acres) for the maintenance yard main yard shop structure, but does not include the total acreage for the whole maintenance yard described on pages 5 and 6 of the Air Quality Study. Then, in the URBEMIS2007 output sheets for the maintenance facility, the total acres disturbed is shown as seven acres with a maximum daily acreage disturbed as 1.75 acres. In the Final EIR, the total area of the maintenance yard should be included in the description on pages 5 and 6 and that total area figure should be consistent throughout the document, i.e., the URBEMIS2007 output sheets, etc.
2. Construction was estimated using the URBEMIS2007 model Version 9.2.4. The lead agency's consultant, PBS&J provided SCAQMD staff with URBEMIS input files and an typical day list of equipment by year (DEIR Cost Estimate.xls) provided by another lead agency consultant, AECOM, as separate submittals from the Draft EIR. In 2011, 70 pieces of equipment are listed in 2012, 84 pieces of equipment are listed in the DEIR Cost Estimate.xls equipment list. There are four crawler cranes, two dozers, two wheeled loaders, 3 to 4 backhoe loaders, one to two wheeled graders, etc for 2011 and 2012 in the DEIR Cost Estimate.xls equipment list. Comparing these numbers to those in the URBEMIS runs, it appears that too few pieces of equipment were modeled in URBEMIS (even if the maintenance facility URBEMIS equipment list and the general 2011 and 2012 URBEMIS equipment list are added together).

Since URBEMIS is designed to generate peak daily emissions, it is expected that the types and number of pieces of equipment should at least be equivalent to the typical day list of equipment. This discrepancy should be resolved and URBEMIS estimated peak daily construction emissions should be developed from peak daily construction equipment usage in the Final EIR. The assumptions and data used to generate URBEMIS files should be clearly and fully documented so that the public and commenting agencies can review the construction estimation. The results of the URBEMIS runs should be summarized in the Final EIR fashion that the public can follow its development from the URBEMIS output.

Localized Significance Thresholds Analysis

3. In past telephone discussions between the lead agency and SCAQMD staff, the lead agency stated that grading would be done over the entire area in a single phase. However, the air dispersion modeling appears to be done only for a 0.47 acre area (7.62 m^2 initial lateral dimension x 2.15 factor for adjacent volume sources = 16.382 m^2 volume length x 116 = $1,900 \text{ m}^2$ = 0.47 acres). In addition, the URBEMIS2007 output sheets for the maintenance yard shows a maximum daily acreage disturbed figure of 1.75 acres. Although there is a mitigation measure on page 29 of the Air Quality Study that states that site grading during construction would be limited to two acres per day, the figures used throughout the ceqa document should be consistent in the narration as well as with the different analyses used to estimate project air quality impacts. These apparent discrepancies should be reconciled in the Final EIR.
4. PBS&J stated in a draft memo that the construction localized significance thresholds (LST) analysis was completed according to the SCAQMD's Localized Significance Threshold Methodology; however, little to no documentation was provided on the LST analysis. As such, SCAQMD staff could not determine if the analysis did follow the methodology. The LST analysis should clearly document how the emissions and area of activity from the URBEMIS model was prepared for input into the air dispersion model ISCST3 (i.e., consistency between the data in both models should be demonstrated). All assumptions and modeling options (e.g., air dispersion coefficients, source parameters, variable emission rates, etc.) should also be documented in the Final EIR. Any posted processing (e.g., NO-NO₂ factors, etc.) should be documented.
5. The air quality analysis on page 26 states that the construction LST analysis was prepared using air dispersion modeling since the maintenance facility would be over five acres in size and constructed at one time. The maintenance facility is listed as seven acres in size in the URBEMIS input file (Expo Maintenance Facility with Mitigation.urb924). However, the source area modeled in ISCST3 appears to only be 0.47 acre (7.62 m^2 initial lateral dimension x 2.15 factor for adjacent volume sources = 16.382 m^2 volume length x 116 = $1,900 \text{ m}^2$ = 0.47 acres). Since URBEMIS by default assumes that only a third of total site is graded per day, care should be given that the emissions and areas modeled in ISCST3 match those used in URBEMIS and the project description. These discrepancies should be resolved and documented in the Final EIR.
6. In the Draft EIR, the lead agency determined that no criteria pollutants were locally significant, however, PBS&J provided SCAQMD staff with preliminary revised air dispersion model concentrations that exceedance of the local significance threshold for PM₁₀. If, as shown by the revised dispersion modeling concentrations that PM₁₀ concentrations are locally significant, then the analysis should be updated and the conclusion should be revised in the Final EIR.
7. It is not clear from the Draft EIR how close the different construction sites associated with the proposed project are to each other. This information was sent in a separate

communication to SCAQMD staff. The information should be included in the Final EIR to demonstrate that construction operations from multiple sites associated with the proposed project would not significantly adversely affect any receptors by the combined affects of the multiple sites. If project related sites are close enough to adversely impact the same receptors, then concentrations at the effected receptors generated from each site should be added together. This can be done by either modeling the sites together or modeling the sites separately with the same receptors and adding the concentration from each site at each receptor together.

8. During telephone discussions PBS&J stated that a quantitative LST analysis was prepared only for the maintenance facility based on the assumption that since the maintenance facility was the largest source of construction emissions with receptors on the fence line, if it did not generate locally significant concentrations then smaller construction elements of the proposed project would also not likely be locally significant. However, if emissions generated during the construction of the maintenance facility are locally significant, then the lead agency should evaluate other construction elements to determine if these smaller elements would also be significant. This analysis should be presented in the Final EIR.
9. No analysis was completed on operational emissions. Activities at the maintenance facility were not described nor analyzed for adverse air quality impacts. Since the proposed project also includes additional parking structures and or lots, an air quality analysis should be completed to demonstrate that the activities at the maintenance facility, and new or expanded parking structures or lots do not generate adverse air quality impacts.

Mitigation Measures for Construction Activities

10. Based on the lead agency's estimate that peak daily construction emissions with mitigation would exceed the SCAQMD daily significance threshold for NO_x (Table 4-2 and Table 4-3 on pages 27, 28, and 30 of the Air Quality Study), the lead agency states on page 28 that "The construction contract for the selected alternative would require specific stipulations that the contractor must follow to meet criteria included in the MTA's Systems Design Criteria and Standards, to minimize adverse effects during construction." In the Air Quality portion on page 36 of the Executive Summary in Table 8, the lead agency, however, the lead agency does not include those required measures from pages 28-30 of the Air Quality Study but puts "None" under mitigation measures in Table 8. In Table 8 in the Air Quality portion of the Executive Summary and throughout the Final EIR, the lead agency should be consistent and show in detail the specific measures the lead agency will adopt and intends to implement to reduce air quality impacts from construction NO_x and fugitive dust activities (see also comments number #3 and #12).
11. Because the lead agency has determined that construction quality impacts from the proposed project are estimated to exceed established daily significance thresholds for nitrogen oxide (NO_x), the SCAQMD recommends that the lead agency consider modifying the following measures listed in the Final Draft Air Quality (January 2009)

Project Director

on page 29 and adding the following mitigation measures to further reduce NO_x and fugitive dust construction air quality impacts from the project, if applicable and feasible:

Modifications:

- During construction, operators of any gas or diesel fueled equipment, including vehicles, shall be ~~encouraged~~required to turn off equipment if not in use or left idle for more than 5 minutes.
- ~~Cover or have water applied to the exposed surface of~~ all trucks hauling dirt, sand, soil, or other loose materials prior to leaving the site to prevent dust from impacting the surrounding areas.
- Sweep streets adjacent to the proposed project site at the end of the day if visible soil material is carried over to adjacent roads (recommend water sweepers with reclaimed water).

Additions:

- Require construction equipment that meet or exceed Tier 2 standards and equip construction equipment with oxidation catalysts, particulate traps and demonstrate that these verified/certified technologies are available;
- Use electricity from power poles rather than temporary diesel or gasoline power generators;
- Configure construction parking to minimize traffic interference;
- Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow;
- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site;
- Schedule construction activities that affect traffic flow on the arterial system to off-peak hour to the extent practicable;
- Reroute construction trucks away from congested streets or sensitive receptor areas;
- All vehicles and equipment will be properly tuned and maintained according to manufacturers' specifications; and
- Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 mph.

Mitigation Monitoring Program

12. On page 28 of the Air Quality Study, the lead agency a Mitigation Plan to control construction air quality impacts from equipment and fugitive dust and also on page 29 describes mitigation measures to reduce short-term construction emission impacts for the proposed project making reference to a “grading/erosion control plan” that “will abide by the provisions of SCAQMD’s Rule 403 as related to fugitive dust.” Although the lead agency has included mitigation measures for the construction emission impacts, the lead agency’s mitigation-monitoring program is not described. In accordance with CEQA Guidelines § 21081.6, please include in the Final EIR how the lead agency will monitor compliance with the measures outlined in the Draft EIR. In addition, prior to the lead agency’s approval of the Mitigation Monitoring Plan, if there are any mitigation measures that the SCAQMD is responsible for monitoring, staff would appreciate reviewing these measures to verify that the SCAQMD has jurisdictional authority over them.

Alternative Air Quality Analysis

1. Alternatives were not described in sufficient detail to determine if the air quality analysis of the alternatives was prepared correctly. Air quality analyses should be prepared for the alternatives in a way that allows the public to understand and follow the development of their potential adverse air quality impacts.

No operational air quality analyses appear to be prepared for the proposed project or alternatives. The analysis is important since one alternative, Transportation Systems Management (TSM) Alternative, includes additional bus routes. The air quality analysis states that the expansion of bus service would lower VMT. However, lower automobile VMT may not equate to better air quality for specific projects since bus VMT would increase and buses generate more criteria pollutants than automobiles. Buses also generate diesel exhaust particulate, which is considered a toxic. Further analysis that demonstrates the TSM alternative would also reduce criteria pollutants (e.g., ridership projections) should be included in the Final EIR.

A comparison of adverse operational air quality impacts generated by the proposed project and alternatives should be included in the Final EIR (CEQA Guidelines §15126.6). The analysis should include emissions from secondary sources such as the LRT maintenance facility.