



South Coast
Air Quality Management District

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

E-Mailed: February 24, 2011
ctran@planning.lacounty.gov

February 24, 2011

Ms. Christina Tran
Los Angeles County
Department of Regional Planning
320 West Temple Street
Los Angeles, CA 90012

**Review of the Draft Environmental Impact Report (Draft EIR)
for the Proposed Aviation Station Project**

The South Coast Air Quality Management District (AQMD) 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 Environmental Impact Report (Final EIR) as appropriate.

Because the lead agency has determined that construction impacts are significant, the AQMD staff recommends that pursuant to Section 15370 of the California Environmental Quality Act (CEQA) Guidelines, additional mitigation measures are considered to minimize the project's significant air quality impacts during construction operations. Further, the AQMD staff recommends that the lead agency revisit the Local Significance Threshold (LST) analysis in the draft Environmental Impact Report (Draft EIR) as it appears that the approach used does not follow standard AQMD methodology. Details regarding these comments are attached to this letter.

Pursuant to Public Resources Code Section 21092.5, AQMD staff requests that the lead agency 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 Bob Gottschalk, Air Quality Specialist at (909) 396-2456, 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 initial "I" and "M".

Ian MacMillan

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

Attachment

IM:BG

LAC110111-01
Control Number

Mitigation Measures for Construction Air Quality Impacts

1. Given that the lead agency's construction air quality analysis demonstrates significant air quality impacts from PM10 and PM2.5 emissions due to exceedance of Local Significance Thresholds, the AQMD staff recommends that the lead agency provide additional mitigation pursuant to CEQA Guidelines §15370. Specifically, AQMD staff recommends that the lead agency minimize or eliminate significant adverse air quality impacts by adding the mitigation measures provided below.
 - 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,
 - Reroute construction trucks away from congested streets or sensitive receptor areas,
 - Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation,
 - Improve traffic flow by signal synchronization, and ensure that all vehicles and equipment will be properly tuned and maintained according to manufacturers' specifications,
 - Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export),
 - During project construction, all internal combustion engines/construction equipment operating on the project site shall meet EPA-certified Tier 2 emissions standards, or higher according to the following:
 - ✓ Project Start, to December 31, 2011: All off-road diesel-powered construction equipment greater than 50 hp shall meet Tier 2 off-road 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 off-road diesel-powered construction equipment greater than 50 hp shall meet Tier 3 off-road 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 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 AQMD "SOON" funds. Incentives could be provided for those construction contractors who apply for AQMD "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>

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.

Local Significance Thresholds (LST) Methodology

2. Table 4.2-6 of the DEIR compares construction emissions from the project with Local Significance Thresholds (LST). The AQMD Mass Rate LST Look-up Tables are a function of receptor distance and the proposed disturbed area. Based on a receptor distance of 25 meters (nearest receptors located directly across Judah Ave. and 117th St. from project site), and a maximum daily project area of 1.25 acres during mass grading and fine grading operations, the appropriate LST for PM10 for this project is 6 lbs/day. This is derived by linear interpolation between the values from the table for 1 acre and 2 acres for source receptor area 3. Similarly, the appropriate LST for PM2.5 is 3.5 lbs/day. It appears that the Draft EIR incorrectly compares project emissions to LSTs derived from the 5 acre tables for PM10 and PM2.5.