



# South Coast Air Quality Management District

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## **Review of the Draft Environmental Impact Report (Draft EIR) for the Runway 7L/25 R RSA and Associated Improvements Project**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The Draft EIR includes quantification of air quality impacts during construction and subsequent operations of the proposed runway project. Supporting calculation and modeling files were also provided to SCAQMD staff and comments in this letter are based on a review of those files. The following comments are intended to provide guidance to the Lead Agency and should be incorporated into the Final Environmental Impact Report (Final EIR) as appropriate. We appreciate the lead agency's consideration of this late comment letter, and the willingness to discuss the project with our staff in detail.

The Draft EIR concludes that operational air quality impacts and potential health risks during operation of the project are less than significant. In addition, only NO<sub>x</sub> emissions were found to present a significant impact during construction, both for regional and localized impacts. However, after reviewing the supporting files it appears that not all of the emissions sources were included prior to making these impact determinations. In particular, all of the airport emissions calculated using the EDMS software were not included. Aircraft will need to be re-routed onsite during construction as one of the runways will be temporarily closed. This re-routing activity was calculated in the supporting files provided to SCAQMD staff, but not presented in the Draft EIR. Because these emissions represent the majority of emissions from the project, they should be included prior to determining air quality impacts. The Final EIR should therefore be revised to include these emissions. In the event that the lead agency determines that the revised analysis results in additional air quality impacts, the Lead Agency should consider providing additional mitigation measures 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,



Ian MacMillan

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

Attachment

IM:DG

LAC130919-06  
Control Number

### Construction Emissions Quantification

1. The air quality analysis concludes that regional construction emissions for all pollutants except NO<sub>x</sub> from the proposed project will result in less than significant air quality impacts, however, the emission calculations that support this conclusion are not clearly presented in the Draft EIR. Specifically, it appears that the regional construction emissions analysis does not include the potential increase of emissions from aircraft operations (i.e., emissions resulting from additional taxiing time) during construction of the proposed project. Based on Table 4-1 (Assumed Taxi Times During Runway Closure) the lead agency determined that the proposed project will result in additional taxiing times during project construction. However, it does not appear that the lead agency included these emissions impacts that were quantified using the Federal Aviation Administration's (FAA's) Emissions and Dispersion Modeling System (EDMS) software. Therefore, the SCAQMD staff recommends that the Lead Agency modify the air quality analysis to include any additional emissions from aircraft operations during construction of the proposed project.

### Health Risk Assessment

2. The Draft EIR includes a Health Risk Assessment (HRA) that evaluates potential risks from construction activities. The HRA concludes that all health risks would be less than significant. SCAQMD staff is unable to verify if the determination of a less than significant impact may be valid. The very low non-carcinogenic results (HI <0.01) are surprising given that the recently approved Specific Plan Amendment Study determined that short term toxic impacts (primarily from jet engines) would exceed SCAQMD thresholds. The cause of this impact in the SPAS EIR was due to northward relocation of the runway and increased activity along it. Although this project does not include relocation of the northern runway, the activity level of individual runways will increase substantially during construction as a result of the closed runway. It is reasonable to infer that the health risks would therefore increase substantially with the increase in activity.

Upon review of the HRA, it appears that emissions from re-routing activity at the airport (as calculated with EDMS) were not included in the health risk assessment. The Final EIR should include the potential health risks from emissions calculated by EDMS, especially including acute toxic impacts (e.g., from acrolein and formaldehyde).

### Mitigation

3. In the event that the lead agency determines that the revised analysis results in additional air quality impacts the SCAQMD staff recommends that the Lead Agency provide additional mitigation measures pursuant to Section 15126.4 of the California Environmental Quality Act (CEQA) Guidelines. Tier 4-final construction equipment is already assumed for the majority of vehicles used for this project, however some vehicles are assumed to only use tier 4-interim engines. The lead agency should investigate if additional tier 4-final equipment is available. In addition, haul trucks are assumed to meet 2007 emission standards. 2010 truck emission standards would provide an approximately 60% reduction in NO<sub>x</sub> emissions from

this source based on values presented in the Draft EIR calculation sheets. The lead agency should consider only using trucks meeting 2010 emissions standards.

### Baseline

4. It is unclear how the Draft EIR treats the CEQA baseline for determining air quality impacts from this project. For example, Table 4.1-14 uses a traditional 'existing conditions' baseline, while Table 4.1-15 uses a future year 2015 baseline. While utilizing both baselines may be appropriate for this infrastructure project, the Final EIR should include additional explanation of the choice of baseline for determining impacts. This discussion should also apply to any modifications to the construction period impacts based on comments above.

### Operational Impacts

5. The text of the Draft EIR indicates that Table 4.1-14 presents the incremental air quality impact from operating the project by comparing 2015 project emissions against 2011 emissions. However, from the raw EDMS output files provided to SCAQMD, it appears that there may be some errors in this table. For example, the table shows 1 lb/day of NO<sub>x</sub>, yet the EDMS outputs indicate that the difference between 2011 and 2015 emissions is 1,785 pounds per day. This emission difference is above SCAQMD's significance threshold and represents a substantial increase in emissions. It is not clear however that the scenario modeled for 2011 is equivalent to the scenario modeled for 2015. The Final EIR should explain this discrepancy, and clarify the operational air quality impacts.

Similar to the comment above, Table 4.1-15 shows 1 lb/day of NO<sub>x</sub> when comparing 2015 project and no-project emissions. The EDMS output files show a difference of approximately 12 lb/day. The 2015 project and no-project scenarios do not appear to be different in the same way that the 2011 scenario is different. This discrepancy should also be clarified in the Final EIR.

### Dispersion Modeling Inputs

6. Some of the assumptions used to conduct the air dispersion modeling should be reviewed and revised as necessary based on the comments below.
  - a. The dispersion modeling conducted to determine localized NO<sub>2</sub> impacts utilized a default in-stack NO<sub>x</sub> ratio of 0.1. EPA recommends using a ratio of 0.5 in the absence of source-specific information.<sup>1</sup>
  - b. The dispersion modeling used only one year of meteorological data (met data) to determine air quality impacts. SCAQMD provides 5 years of met data on its website<sup>2</sup> as this is the recommended duration based on EPA guidance. The Draft EIR indicates that a screening analysis determined the worst case year from this 5 year period. It is not clear from reading the Draft EIR how this single year was chosen. It appears that the screening analysis did not consider different averaging

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<sup>1</sup> See page 5 of the memo available at this link:

[http://www.epa.gov/scram001/guidance/clarification/Additional\\_Clarifications\\_AppendixW\\_Hourly-NO2-NAAQS\\_FINAL\\_03-01-2011.pdf](http://www.epa.gov/scram001/guidance/clarification/Additional_Clarifications_AppendixW_Hourly-NO2-NAAQS_FINAL_03-01-2011.pdf)

<sup>2</sup> <http://www.aqmd.gov/smog/metdata/MeteorologicalData.html>

periods or the inclusion of ambient ozone data. The Final EIR should discuss if the screening analysis took these parameters into account. If the screening analysis does not include consideration of how the 'worst case' impacts may change based on different averaging periods or chemistries, then the full 5-year data set should be used.