



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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John Wayne Airport
Attn: Lea Choum, JWA Project Manager
3160 Airway Avenue
Costa Mesa, CA 92626

Draft Program Environmental Impact Report (Draft PEIR) for the Proposed John Wayne Airport (JWA) General Aviation Improvement Project (SCH: 2017031072)

South Coast Air Quality Management District (SCAQMD) staff 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 CEQA document.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to demolish 134,000 square feet of existing facilities and construct and operate two full service fixed base operators (FBO) totaling 97,000 square feet within a 504 acre site. The project is located at the John Wayne Airport in the City of Santa Ana.

SCAQMD Staff's Summary of Air Quality Analysis

The Lead Agency determined the proposed project would have less than significant impacts to regional and localized air quality during construction and operation.¹ However, the lead agency did not adequately analyze the proposed project's air quality impacts from construction and operation. Additionally, the Lead Agency preformed a HRA screening process that does not adequately address the potential health risk impacts associated with the proposed project. Therefore, SCAQMD staff has comments regarding the air quality analysis and has recommendations for further mitigation measures. Detailed comments are provided below.

SCAQMD Staff's Comments

Overlapping Construction and Operation

The project is expected to be built-out in multiple phases in order to minimize disruption to current JWA operations.² For this reason, it is reasonably foreseeable that emissions from part of the project's construction phase would likely occur simultaneous to the project's operational phase. However, the Lead Agency did not analyze a scenario where construction activities overlap with operational activities. Therefore, to analyze the worst-case scenario for air quality impacts, SCAQMD staff recommends that the Lead Agency identify the overlapping phases, combine construction emissions (including emissions from demolition) with operational emissions, and compare the combined emissions to SCAQMD's air quality CEQA operational thresholds of significance to determine the level of significance in the final CEQA document.

Operational Emissions from Permitted Unit

The proposed project may include a 5,000 – 20,000 gallon avgas aboveground storage tank. Upon review of the Draft PEIR it did not appear SCAQMD that the Lead Agency quantified and incorporated emissions from the aboveground storage tank into the project's operational emissions analysis.

¹ Draft PEIR, Section 4.2-16.

² Draft PEIR, Page 3-19.

Therefore, SCAQMD staff recommends that the Lead Agency clarify if these emissions were accounted for in the operational analysis. If they were not, the Lead Agency should quantify the emissions and incorporate them into the proposed project's operational emissions analysis in order to determine the level of significance for the whole of the project in the final CEQA document.

Health Risk Assessment

The Lead Agency incorporated by reference the emissions that were analyzed in the JWA 2014 Settlement Agreement Amendment Final EIR 617 (Final EIR 617) and the associated Health Risk Assessment (HRA). Referencing this prior CEQA document, the Lead Agency performed a HRA screening process in order to determine the level of significance for the maximum incremental cancer risk that the proposed project may cause.

Emissions from Volatile Organic Compounds (VOCs) and Particulate Matter (PM) that were analyzed in Final EIR 617 were compared to those analyzed in the proposed project; results of the comparison show that the proposed project is expected to contribute a fraction of these emissions. Since Toxic Air Contaminants (TACs) are expressed as fractions of VOCs and PM emissions, the Lead Agency concluded that the TACs from the proposed project, less than those previously analyzed in Final EIR 617, would have less than significant impacts to the maximum incremental cancer risk at sensitive receptors.³

SCAQMD staff is concerned that the reference to Final EIR 617 and the associated HRA does not adequately address potentially significant health risk impacts associated with the proposed project since the Final EIR 617 evaluated different operations. The proposed project includes the storage and usage of avgas, which is the only remaining transportation fuel that contains lead.⁴ Upon review of Final EIR 617 and the HRA, it did not appear to SCAQMD staff that the storage and use of avgas was evaluated.⁵ Additionally, general aviation activities for the proposed project would likely occur at different locations on the airport's property than previously analyzed for the Final EIR 617.⁶ Therefore, it cannot be said with certainty that the health impacts to nearby sensitive receptors evaluated in the Final EIR 617 HRA will remain the same for the proposed project since the location of emissions sources affects emission concentrations and dispersion, influencing the health risk impacts to nearby sensitive receptors.

Further, since the adoption of Final EIR in 2014, the Office of Environmental Health Hazards Assessment (OEHHA) has updated the Air Toxics Hot Spots Program Guidance Manual for the Preparation of Risk Assessments.⁷ The methodology used in the Final EIR 617 HRA is now outdated and may underestimate health risk impacts. Therefore, considering the above mentioned factors, SCAQMD staff recommends that the Lead Agency prepare a HRA that is specific to the proposed project and uses the most recent OEHHA methodology. If the Lead Agency determines that the project results in significant health risk impacts SCAQMD staff recommends that the lead agency consider additional mitigation measures to reduce the project's health risk impacts available at: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>.

SCAQMD Permits and Rules

If the proposed project includes a 5,000 – 20,000 gallon avgas aboveground storage tank, then a SCAQMD permit for construction and operation will be required. The assumptions in the air quality analysis for the CEQA document will be the basis for permit conditions and limits. For more information on permits, please visit SCAQMD's webpage at: <http://www.aqmd.gov/home/permits>. Permitting questions can be directed to SCAQMD Engineering and Permitting staff at (909) 396-3385. The CEQA

³ Draft PEIR, Section 4.2, Pages 26-29.

⁴ Draft PEIR, Section 4.5, Page 9.

⁵ Final EIR 617, Section 4.1.

⁶ Final EIR 617, Section 4.1 Page 12 and Draft PEIR, Air Quality Technical Report, Page 9.

⁷ OEHHA Guidance Manual, Accessed at: <https://oehha.ca.gov/media/downloads/cmr/2015guidancemanual.pdf>.

document should also discuss compliance with applicable SCAQMD Rules, including, but may not be limited to, Rule 201 – Permit to Construct, Rule 203 – Permit to Operate, and Rule 1401 – New Source Review of Toxic Air Contaminants.⁸

Response to Comments

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), SCAQMD staff requests that the Lead Agency provide SCAQMD staff with written responses to all comments contained herein prior to the certification of the final CEQA document. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful or useful to decision makers and to the public who are interested in the proposed project.

SCAQMD staff is available to work with the lead agency to address any air quality questions that may arise from this comment letter. Please contact Alina Mullins, Assistant Air Quality Specialist, at amullins@aqmd.gov or (909) 396-2402, should you have any questions.

Sincerely,

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DG/AM

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Control Number

⁸ SCAQMD, Rule 201 – Permit to Construct Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf?sfvrsn=4>, Rule 203 – Permit to Operate Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf?sfvrsn=4>, and Rule 1401 – New Source Review of Toxic Air Contaminants Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf?sfvrsn=4>.