



South Coast
Air Quality Management District

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Mr. Adam Villani, Planning Assistant
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Environmental Review Section
200 N. Spring Street, Room 750
Los Angeles, CA 90012

**Review of the Draft Environmental Impact Report (Draft EIR)
for the Proposed Loyola Marymount University Master Plan Project**

The South Coast Air Quality Management District (SCAQMD) 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.

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 MND. 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,

A handwritten signature in black ink that reads "Ian V. MacMillan".

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

Attachment

IM:JK:DG

LAC100212-02
Control Number

Construction Emissions Air Quality Analysis and Mitigation Measures:

Five Acre Construction Emissions Mitigation Measure

1. In Section 4.4.1 (Construction Emission Impacts) on pages IV.B.1-38 and IV.B.1-39 of the Draft EIR the lead agency states that its analysis assumes only five acres of disturbance to evaluate localized air quality impacts during the construction phase of the project; however, the lead agency does not include any provisions or requirements to limit the project's construction activity to only five acres per day. Therefore, SCAQMD staff requests that the lead agency require a mitigation measure that limits the project's construction activity to five acres or less per day.

Localized PM10 and PM2.5 Mitigation Measures

2. In Section 4.4.1.6 (Localized Significance Threshold Analysis) the lead agency evaluated localized air quality impacts from construction activities that will occur in close proximity to sensitive receptors (i.e. residential and school properties) surrounding the project site. As a result, the lead agency's localized construction air quality analysis demonstrates that criteria pollutants including Particulate Matter (PM10) and Fine Particulate Matter (PM2.5) emissions exceed the SCAQMD's daily significance thresholds. Therefore, the SCAQMD recommends that the lead agency consider adding the following mitigation measures to further reduce localized PM10 and PM2.5 air quality impacts from the construction phase of the project, if feasible:

NOx and PM2.5:

- 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,
- Improve traffic flow by signal synchronization, and ensure that all vehicles and equipment will be properly tuned and maintained according to manufacturers' specifications, and
- Require the use of electricity from power poles rather than temporary diesel or gasoline power generators.

In addition to the above NOx and PM2.5 mitigation measures, SCAQMD staff recommends modifying the existing mitigation measures as follows:

- MM-AQ-4 Electricity rather than temporary diesel or gasoline-powered generators shall be used at ~~least half of the~~ all times.

MM-AQ-8 The project applicant shall require all on-site ~~off-road~~ construction equipment to meet EPA Tier 2 or higher emissions standards according to the following:

- April 1, 2010, to December 31, 2011: All offroad diesel-powered construction equipment greater than 50 hp shall meet Tier 2 offroad 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 offroad diesel-powered construction equipment greater than 50 hp shall meet Tier 3 offroad 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 offroad 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.

~~(Model Year 2001 or later) at a minimum. Construction equipment meeting Tier 3 and 4 emissions standards will be implemented when commercially available. This requirement will apply to any piece of equipment which is expected to operate on site more than 15 days. In addition to meeting Tier 2 emissions standards, the project applicant shall use late model heavy duty diesel powered construction equipment with cooled exhaust gas recirculation at the project site.~~

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.

Also, the lead agency should consider encouraging construction contractors to apply for SCAQMD “SOON” funds. Incentives could be provided for those construction contractors who apply for SCAQMD “SOON” funds. The “SOON” program provides up to \$60 million dollars 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>

PM10:

- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation, and
- Replace ground cover in disturbed areas as quickly as possible.

CEQA Guidelines 15168(c) and 15168(e) for Program EIR’s

3. Given that the proposed project is a master plan which is intended to guide future campus improvements over the next twenty years the SCAQMD staff recommends that the lead agency carefully examine all future projects subject to the master plan and if additional potentially significant impacts are identified (e.g., a health risk assessment identifies a risk greater than one in one hundred thousand), the lead agency should prepare the necessary CEQA document pursuant to the CEQA Guidelines 15168(c). Finally, SCAQMD staff requests that pursuant to Section 15168(e) of the CEQA Guidelines the lead agency place the SCAQMD on future notices of activity.

Health Risk Assessment (HRA):

HRA Stack and Receptor Heights

4. The HRA used a stack and receptor height of five meters. Documentation should be provided for the stack height assumption. Receptor height should be ground level or at breathing height (1.8 meters). The final EIR should include an HRA analysis with standard receptor heights and documentation for the stack height assumption.

Modeling Methodologies

5. The lead agency used two different methods of modeling to analyze localized air quality impacts and health risk impacts from the proposed project. Specifically, the lead agency used the Industrial Source Complex-Short Term (ISC-ST3) Model to demonstrate localized impacts from the proposed project and the SCREEN3 Model to demonstrate the project’s health risk impacts. As a result, the Draft EIR has yielded two different contaminant concentrations at the surrounding sensitive receptors.

The ISC-ST3 Model correctly used volume sources while the SCREEN3 Model only used area sources. The use of volume sources and the corrected source and receptor heights may yield higher contaminant concentrations for the HRA. SCAQMD staff requests that the lead agency revise the HRA using volume sources and the correct source and receptor heights. In the event that the lead agency's revised HRA requested in this comment yields impacts that exceed the SCAQMD's significance thresholds, the SCAQMD recommends that the lead agency consider all feasible mitigation to further reduce health risk impacts from the construction phase of the project.

70 Year Exposure Duration

6. Cancer risks to the project's nearest sensitive receptors including residential, workplace and student receptors were evaluated using an exposure duration of 20 years. Based on SCAQMD methodologies for evaluating cancer risks all sensitive receptors are required to be evaluated with a 70-year exposure duration for health risk management (i.e., significance). A shorter exposure period may be used for risk communication but significance for all sensitive receptors should be based on a 70-year exposure duration. The final EIR and HRA should include health risk for the above mentioned sensitive receptors using the SCAQMD recommended 70 year exposure duration. In the event that the 70 year exposure duration yields impacts that exceed the SCAQMD's significance thresholds a refined health risk analysis and/or all feasible mitigation to reduce health risk impacts from the construction phase of the proposed project may be required.