



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL AND USPS:

October 9, 2018

equintanilla@lawa.org

Evelyn Quintanilla, Chief of Airport Planning II

Los Angeles World Airports

Land Use and Entitlement Section

P.O. Box 92216

Los Angeles, CA 90009-2216

Draft Environmental Assessment (Draft EA) for the Proposed Los Angeles International Airport (LAX) Receiving Station “X” Project

The 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 EA.

SCAQMD Staff’s Summary of Project Description

The lead agency proposes the demolition of 274,000 square feet (sq. ft.) of pavement and the construction of a single-story 4,800 sq. ft. control room with 86,200 total sq. ft. of electrical infrastructure on either side of the building (proposed project). The proposed project is located on the southwest corner of Westchester Parkway and Pershing Drive in the Los Angeles International Airport (LAX). Construction of the proposed project is expected to occur over a 3-year period with operation beginning in 2023.

SCAQMD Staff’s Summary of Air Quality Analysis

In the air quality analysis, the lead agency quantified the regional impacts associated with construction of the proposed project. The lead agency did not quantify operational emissions because “there would be a negligible increase in emissions.” The lead agency determined that implementation of the proposed project would have less than significant air quality impacts to regional and local air quality.

General Comments

Upon review of the Draft EA, SCAQMD staff found that the lead agency assumed off-road construction equipment would meet or exceed United States Environmental Protection Agency (USEPA) tier 4 standards in the air quality analysis. However, the Draft EA did not include project design features or mitigation measures requiring the use of tier 4 construction equipment during the construction phase of the proposed project. Therefore, SCAQMD staff recommends that the lead agency include mitigation measure AQ-1 provided below in the Final EA.

Recommended Mitigation Measure

AQ-1 All off road diesel-powered construction equipment greater than 50 horsepower (hp) shall meet or exceed the Tier 4 emission standards, where available. In the event that construction equipment cannot meet the Tier 4 engine certification, the developer must demonstrate through future study with written findings supported by substantial evidence that is approved by the lead agency before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, reduction in the number and/or horsepower rating of construction equipment, limiting the number of daily construction haul truck trips to and from the Project, using cleaner vehicle fuel, and/or limiting the number of individual construction project phases occurring simultaneously.

Further, the proposed project could result in more than 15,000 diesel-fueled haul truck trips for material export from demolition and grading activities. Therefore, SCAQMD staff recommends the additional mitigation measure below.

Additional Mitigation Measure

AQ-2 All diesel-fueled trucks accessing the proposed project shall meet the U.S. Environmental Protection Agency/California Air Resource Board truck engine standard for Model Year 2010 or better. In the event that that 2010 model year or newer diesel haul trucks cannot be obtained, provide documentation as information becomes available and use trucks that meet EPA 2007 model year NOx emissions requirements, at a minimum. Additionally, consider other measures such as incentives, phase-in schedules for clean trucks, etc.

SCAQMD Permits

If any subsequent development or activities implemented under the proposed project require a permit from SCAQMD, SCAQMD is a Responsible Agency. For more information on permits, please visit SCAQMD webpage at: <http://www.aqmd.gov/home/permits>. Questions on permits can be directed to SCAQMD's Engineering and Permitting staff at (909) 396-3385.

Conclusion

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final EA. 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. SCAQMD staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Robert Dalbeck, Assistant Air Quality Specialist - CEQA IGR Section, at [909-396-2139](tel:909-396-2139), if you have any questions regarding these comments.

Sincerely,

Daniel Garcia

Daniel Garcia
Program Supervisor
Planning, Rule Development & Area Sources

DG/RD
LAC180911-12
Control Number