



South Coast

Air Quality Management District

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E-Mailed: February 14, 2012
David.Attaway@lacity.org

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Mr. David Attaway
Los Angeles Department of Recreation and Parks
221 N. Figueroa Street, Suite 100
Los Angeles, CA 90012

Review of the Draft Environmental Impact Report (Draft EIR)
for the Proposed Lakeside Park Project

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

The AQMD staff is concerned about the project's close proximity (within 500 feet) to the 5 and 405 Freeways. Given that the proposed project is considered a new sensitive land use the AQMD staff is concerned about the potential health risk impacts from the high traffic volumes (275,000 average vehicles per day at the 405 interchange) on these freeway segments. Therefore, AQMD staff requests that the lead agency revise the Health Risk Assessment (HRA) based on AQMD's ten cases in one million cancer risk threshold without the project's background risk. Also, the AQMD staff recommends that pursuant to Section 15126.4 of the California Environmental Quality Act (CEQA) Guidelines additional mitigation measures are considered to minimize the project's significant air quality impacts. 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 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". 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:DG

LAC111214-04
Control Number

Health Risk Impacts

1. Based on impact Air-4 in the Draft EIR the lead agency evaluated the project's health risk impacts (257 in-a-million) and compared that with the background risk level (i.e., 540 cases in-a-million) as reported from AQMD's MATES III study. As a result, lead agency determined that the proposed project would not exceed the maximum individual cancer risk (MICR), non-cancer hazard index (HI), and acute HI thresholds. This analysis is not appropriate as the MATES III study determines cancer risk on a 2 kilometer grid. Therefore all locations within that grid share the same average risk from all sources. However, the lead agency's HRA determined that the site-specific risk from just the freeway is 257 in-a-million.

The utility of a site-specific HRA is that it can provide information about the details of a specific site. For example, a site perhaps 1000 feet away would presumably have a much lower cancer risk from the freeway (due to greater distance and dispersion of pollutants), but would still have the same MATES III background risk. The HRA is designed to determine the difference between different siting choices. By comparing to an inappropriate threshold, the lead agency is not able to accurately determine the impacts to the project itself. AQMD staff notes that the CAPCOA guidance cited in the Draft EIR presents different options that air districts throughout California have used to choose a significance threshold. AQMD staff recommends using the ten in one million threshold without considering the background as determined by MATES III. In the event that the project exceeds this threshold the lead agency should provide mitigation in the Final EIR to reduce these impacts to an insignificant level pursuant to Section 15126.4 of the CEQA Guidelines. Mitigation could include alternate configurations of the site that provide buffer zones between the freeway and where people, especially children, will congregate.

Mitigation Measures for Construction Air Quality Impacts

2. Given that the lead agency's construction air quality analysis demonstrates significant air quality impacts from NOx emissions the AQMD staff recommends that the lead agency provide additional mitigation pursuant to CEQA Guidelines §15126.4. 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, and
- Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export) and if the lead agency determines that 2010 model year or newer diesel trucks cannot be obtained the lead agency shall use trucks that meet EPA 2007 model year NOx and PM emissions requirements.

Further, AQMD staff recommends that the lead agency revise Mitigation Measure Air-4 as follows:

- During project construction, all internal combustion engines/construction equipment operating on the project site will meet EPA-Certified Tier 3 emissions standards, or higher according to the following:
 - ✓ Project Start, 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.
 - ✓ 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.