



South Coast Air Quality Management District

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SENT VIA EMAIL & USPS:

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Draft Environmental Impact Report (DEIR) for the Proposed LAX Terminals 2 and 3 Modernization Project

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are intended to provide guidance to the Lead Agency and should be incorporated into the Final EIR.

The proposed project would modernize the existing facilities at Terminals 2 and 3. The improvements are intended to provide improved security, passenger experience, operations, convenience, and quality of service. The improvements would allow for the reconfiguration of the passenger gate positions and aircraft-parking layout at Terminals 2 and 3 to accommodate anticipated airline fleets and uses.

The proposed project would add a total of 832,000 square feet of new building space to the two terminals, thereby resulting 1,620,020 total square feet. It also includes aircraft apron area improvements, restriping of aircraft parking positions, passenger boarding bridge locations, and possibly the relocation of aircraft fuel hydrant pits at both terminals to be compatible with the proposed building changes and anticipated aircraft fleet and uses. The proposed project will be completed in stages and take approximately 76 months (six years and four months) to construct beginning in the fourth quarter of 2017. During construction, both terminals will remain operational at all times.

As shown in the DEIR's air quality and health risk analyses, the unmitigated construction emissions will be less than the SCAQMD's CEQA construction emission thresholds, except for NO_x. Peak daily energy-related operational emissions were calculated and found to be less than the SCAQMD's CEQA operation emission thresholds. However, the unmitigated localized construction impacts relative to NO_x would be significant. After incorporating mitigation measures, regional and localized emissions of NO_x would remain significant. The proposed project's unmitigated cancer risks for residents and on-site workers are less than 3.5 in 1 million, which is below the significance threshold of 10 in 1 million.

The SCAQMD staff has comments on the air quality analysis. Details are included in the attachment. The attachment also includes a discussion of recommended changes to the existing mitigation measures for air quality and proposes new construction mitigation measures which the Lead Agency should implement to reduce the significant air quality impacts.

Pursuant to Public Resources Code Section 21092.5, the SCAQMD staff requests that the Lead Agency provide SCAQMD with written responses to all comments contained herein prior to the certification 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. If you have any questions regarding this letter, please contact me at lsun@aqmd.gov or by phone at (909) 396-3308.

Sincerely,

A handwritten signature in black ink that reads "Lijin Sun". The signature is written in a cursive, slightly slanted style.

Lijin Sun, J.D.
Program Supervisor, CEQA IGR
Planning, Rule Development & Area Sources

Attachment
JW:LS/JC/MS/GM
LAC170223-04
Control Number

ATTACHMENT

Air Quality Analysis

1. As stated in Section 2, *Project Description*, the Lead Agency proposes to use shuttle buses to move construction workers from offsite parking to the job site. Based on a review of the emission output, SCAQMD staff found that shuttle emissions were not included in the emission calculations. SCAMQD staff recommends calculating shuttle bus emissions and including them in the Final EIR.

Compliance with SCAQMD Rules and Identify SCAQMD as a Responsible Agency

2. Based on activities included in the project description, SCAQMD permits will be required. Although permit applications might have already been submitted to the SCAQMD Permitting and Engineering staff, the Final EIR should identify SCAQMD as a responsible agency for the proposed project activities. The reconfiguration of the aircraft fueling system hydrant locations will require permit applications and a health risk assessment under SCAQMD rules including Rule 461 – Gasoline Transfer and Dispensing; Rule 462 – Organic Liquid Loading; and Rule 1401 – New Source Review of Toxic Air Contaminants. For permit questions, please contact SCAQMD Permitting and Engineering staff at (909) 396-2562.
3. In the event that the proposed project requires the use of concrete produced at an on-site (on-airport) concrete batch plant, that may also require SCAQMD permit(s). Questions concerning permits for concrete batch plant operations can be directed to SCAQMD Permitting and Engineering staff at (909) 396-2504.
4. The proposed project will include soil disturbance of approximately 134,400 cubic yards of cut and fill. In the event that soil containing petroleum hydrocarbons is encountered during soil disturbance activities, the Final EIR should include a discussion to demonstrate compliance with SCAQMD's Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil.

Recommended Changes to Existing Mitigation Measure LAX-AQ-1q

Technology Review

5. The DEIR includes 15 air quality mitigation measures, including a step-down provision in Mitigation Measure LAX-AQ-1q. The last bullet point in LAX-AQ-1q requires that LAWA conduct, from time-to-time, independent research and verification of the availability. Given that the construction phase for the proposed project would take more than six years, SCAQMD staff believes that the Lead Agency should take this opportunity to deploy the lowest emission technologies possible by requiring a review and implementation of new, feasible lower-emission technologies every two years and include it as a new mitigation measure in the Final EIR. This deployment should include those technologies that are “capable of being accomplished in a successful manner within a reasonable period of time” (Public Resources Code §21061.1), such as zero and near-zero emission technologies that are expected to be

available during the life of the project. A technology review that is performed every two years will allow the Lead Agency to assess equipment availability, equipment fleet mixtures, and best available emissions control devices. Additionally, to ensure that the biennial technology review is enforceable during the six-year construction phase, the SCAQMD staff recommends that the Lead Agency include the biennial technology review in the project contract agreement, including the Contractor agreement. Furthermore, when a new emission control technology is found to be feasible and would substantially reduce air emissions, but the Lead Agency declines to implement such technology, a subsequent EIR shall be prepared (CEQA Guidelines Section 15162(a)(3)(C)). The SCAQMD staff's recommended revisions to the last bullet point in LAX-AQ-1q are below:

"1q (the last bullet point): [...] LAWA will, ~~from time to time~~ every two years, conduct a technology review, independent research and verification of the availability of the availability of such vehicles and equipment for lease/rent within a 120-mile radius of LAX, which may be used in reviewing the acceptability of the Contractor's good faith efforts and due diligence, and include the biennial technology review as a mandatory condition in the Contractor agreement."

Enforceability

6. Mitigation Measure LAX-AQ-1q provides circumstances under which the on-road haul truck and off-road construction equipment requirements set forth in Air Quality Standard Control Measures 1o and 1p would not apply. CEQA requires that mitigation measures must be fully enforceable through permit conditions, agreements, or other legally binding instruments (Public Resources Code Section 21081.6 (b) and CEQA Guidelines Section 15126.4 (a)(2)). To ensure that the requirement set forth in Air Quality Standard Control Measures 1o and 1p are enforceable, the SCAQMD staff's recommended revisions to mitigation measure LAX-AQ-1q are below:

"1q: The on-road haul truck and off-road construction equipment requirements set forth in Air Quality Standard Control Measures 1o and 1p above shall apply unless any of the following circumstances exist and the Contractor provides a written finding consistent with project contract requirements and obtains written approval from the Lead Agency that: [...]."

Additional Mitigation Measures

7. CEQA requires that all feasible mitigation measures that go beyond what is required by law to minimize any significant impacts. The SCAQMD staff recommends that the Lead Agency include in the Final EIR additional mitigation measures provided below to further reduce the significant adverse construction-related air quality impacts.

Construction Mitigation Measures

- 1) Include in all construction contracts the requirement to use 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export). In the event that that 2010 model year or newer diesel trucks cannot be obtained, provide documentation as information becomes available and use trucks that meet EPA 2007 model year NOx emissions requirements.

- 2) Include in all construction contracts the requirement that all off-road diesel-powered construction equipment greater than 50 hp shall meet Tier 4 off-road emission standards at a minimum. In addition, if not already supplied with a factory-equipped diesel particulate filter, 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. In addition, construction equipment shall incorporate, where feasible, emissions savings technology such as hybrid drives and specific fuel economy standards. In the event that any equipment required under this mitigation measure is not available, provide documentation as information becomes available. A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit at the time of mobilization of each applicable unit of equipment shall be provided. Encourage construction contractors to apply for SCAQMD "SOON" funding incentives to help accelerate the clean-up of off-road diesel vehicles, such as heavy duty construction equipment.
- 3) Enter into a contract that notifies all vendors and construction contractors that vehicle and construction equipment idling time will be limited to no longer than five minutes or another time-frame as allowed by the California Code of Regulations, Title 13 section 2485 - CARB's Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling. For any vehicle delivery that is expected to take longer than five minutes, each project applicant, project sponsor, or public agency will require the vehicle's operator to shut off the engine. Notify the vendors of these idling requirements at the time that the purchase order is issued and again when vehicles enter the gates of the facility. To further ensure that drivers understand the vehicle and construction equipment idling requirement, post signs at each facility entry gates stating idling longer than five minutes is not permitted.
- 4) Employ on-road heavy-duty diesel trucks or equipment with a gross vehicle weight rating (GVWR) of 19,500 pounds or greater that complies with EPA 2007 on-road emission standards for PM and NOx (0.01 gram per brake horsepower - hour (g/bhp-hr) and at least 0.2 g/bhp-hr, respectively).
- 5) Maintain vehicle and equipment maintenance records for the construction portion of the proposed project. All construction vehicles must be maintained in compliance with the manufacturer's recommended maintenance schedule. The Lead Agency will maintain their construction equipment and the construction contractor will be responsible for maintaining their equipment and maintenance records. All maintenance records for each facility and their construction contractor(s) will remain on-site for a period of at least two years from completion of construction.
- 6) Conduct a survey of the proposed project construction area(s) to assess whether the existing infrastructure can provide access to electricity, as available, within the facility or construction site, in order to operate electric on-site mobile equipment. For example, each project applicant, project sponsor, or public agency and/or their construction contractor(s) will assess the number of electrical welding receptacles available.

Construction areas within the facility or construction site where electricity is and is not available must be clearly identified on a site plan. The use of non-electric onsite mobile equipment shall be prohibited in areas of the facility that are shown to have access to

electricity. The use of electric on-site mobile equipment within these identified areas of the facility or construction site will be allowed.

Include in all construction contracts the requirement that the use of non-electric on-site mobile equipment is prohibited in certain portions of the facility as identified on the site plan. Maintain records that indicate the location within the facility or construction site where all electric and non-electric on-site mobile equipment are operated, if at all, for a period of at least two years from completion of construction.

- 7) Provide temporary traffic controls such as a flag person, during all phases of significant construction activity to maintain smooth traffic flow.
- 8) Provide dedicated turn lanes for the movement of construction trucks and equipment on- and off-site.
- 9) Re-route construction trucks away from congested streets or sensitive receptor areas.
- 10) Coordinate with the local city to improve traffic flow by signal synchronization in the area near the construction site.
- 11) Ensure that drivers understand that traffic speeds on all unpaved roads will be limited to 15 mph or less. In addition, post signs on all unpaved roads indicating a speed limit of 15 mph or less.
- 12) Schedule construction activities that affect traffic flow on the arterial system to occur during off-peak hours to the greatest extent practicable.
- 13) If and when winds speeds exceed 25 mph, suspend all excavating and grading activities and shall record the date and time when the use of construction equipment associated with these construction activities are suspended. This log shall be maintained on-site for a period of at least two years from completion of construction.
- 14) If and when any first stage smog alert occurs, record the date and time of each alert, suspend all construction activities that generate emissions, and record the date and time when the use of construction equipment and construction activities are suspended. This log shall be maintained on-site for a period of at least two years from completion of construction.
- 15) Coordinate with the construction contractor to site parking areas to minimize interference with roadway traffic.
- 16) Evaluate the use of alternate fuels for on-site mobile construction equipment prior to the commencement of construction activities, provided that suitable equipment is available for the activity. Equipment vendors shall be contacted to determine the commercial availability of alternate-fueled construction equipment. Priority should be given during the bidding process for contractors committing to use alternate-fueled construction equipment.
- 17) Include in all construction contracts the requirement to cover all haul trucks delivering or hauling away dirt, sand, soil, or other loose materials.
- 18) Require the construction contractor to install and use wheel washers where vehicles enter and exit the construction site onto paved roads or wash off trucks and any equipment leaving the site for each trip to prevent drag-out.

- 19) Require the construction contractor to apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (e.g., previously graded areas inactive for ten days or more).
- 20) Require the construction contractor to replace ground cover in disturbed areas as quickly as possible to minimize dust.
- 21) Require the construction contractor to pave road and road shoulders.
- 22) Require the construction contractor to sweep streets at the end of the day using SCAQMD Rule 1186 and 1186.1 compliant sweepers if visible soil is carried onto adjacent public paved roads. In the event that water sweepers are used, recommend the use of reclaimed water by construction contractor.