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SENT VIA E-MAIL AND ONLINE: March 12, 2021

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Draft Environmental Impact Report (Draft EIR) for the Proposed Los Angeles International Airport Airfield and Terminal Modernization Project (Proposed Project) (State Clearinghouse No.: 2019049020)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. Los Angeles World Airports (LAWA) is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. The following comments include recommended revisions to the CEQA baseline and air dispersion modeling, and information regarding South Coast AQMD permits for stationary equipment that should be included in the Final EIR.

Based on the Draft EIR, the Proposed Project consists of airfield, terminal, and landside improvements at Los Angeles International Airport (LAX)[1]. As part of LAWA's continuing commitment to maintain LAX as a world-class airport, the improvements include an 11-gate concourse facility, a 12-gate terminal, an automated people mover station, a pedestrian bridge, runway reconfiguration, and removal of remote gates[2]. Construction of the Proposed Project will occur in a six-year period from 2022-2028[3]. It is anticipated that operation will begin in 2028[4].

Based on a review of the Draft EIR and supporting technical documents, South Coast AQMD staff has three main comments. A summary of these comments is provided as follows with additional details provided in the attachment.

1. CEQA Baseline: The Draft EIR calculates the Proposed Project's operational emissions and uses the comparison between the operational emissions at the expected buildout conditions (year 2028) and those at the existing conditions (year 2018) to determine the significance level for the Proposed Project's operational air quality impacts. This comparison might have improperly credited the Proposed Project with emission reductions associated with on-road mobile sources that will occur independent of the Proposed Project due to federal and state rules and regulations on clean vehicles and fuel technologies. The Final EIR should use the comparison between the operational emissions in year 2028 with the Proposed Project and the

[1] Draft EIR. Section 1, Introduction and Executive Summary. Page 1-1.
[2] *Ibid.* Page 1-5.
[3] Draft EIR. Section 2, Description of the Proposed Project. Pages 2-77 to 79.
[4] *Ibid.*

emissions in the same year without the Proposed Project to determine the level of significance for the Proposed Project's air quality impacts.

2. Air Dispersion Modeling Parameter: The Draft EIR states that sensitive receptors locations were determined in a manner that would identify peak ambient air pollutant impacts associated with the Proposed Project[5]. However, the receptor grid that was used in the air dispersion modeling was focused only on the fenceline and might not have been large enough to identify the maximum off-site concentrations. The Final EIR should provide additional information to justify the receptor grid used or perform additional modeling with an expanded receptor grid.

3. Responsible Agency and South Coast AQMD Permits: The Proposed Project will use rock crushing equipment during construction, and emergency generators, fire hydrant technologies, and fuel storage tanks during operation. If permits from South Coast AQMD are required, South Coast AQMD should be identified as a Responsible Agency in the Final EIR.

South Coast AQMD staff is available to work with LAWA to address any air quality questions that may arise from this comment letter. Please feel free to contact me at lsun@aqmd.gov, if you have questions or wish to discuss the comments.

Sincerely,

Lijin Sun

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

Attachment
JW:LS/MI
LAC201029-01
Control Number

[5] *Ibid.* Section 4.1.1, Air Quality. Page 4.1.1-14.

ATTACHMENT

South Coast AQMD Staff's Summary of the Air Quality Analysis and Health Risk Assessment

The Draft EIR quantifies the Proposed Project's regional construction emissions, which includes both direct emissions from construction activities and indirect emissions that would occur as a result of temporary runway closures, and the emissions are compared to South Coast AQMD's regional CEQA air quality significance thresholds. Based on the analysis, the Proposed Project's mitigated construction emissions from nitrogen oxides (NOx), volatile organic compounds (VOCs), carbon monoxide (CO), and sulfur oxides (SOx) would be significant and unavoidable at 805 pounds per day (lbs/day), 385 lbs/day, 4,394 lbs/day, and 173 lbs/day, respectively[6]. The Draft EIR includes a comparison between the Proposed Project's criteria pollutants emissions in 2028 and the emissions in 2018 to determine the level of significance for the Proposed Project's regional operational air quality impacts[7]. Based on the analysis, the Proposed Project's mitigated regional operational emissions from NOx, SOx, particulate matter (PM10), and fine particulate matter (PM2.5) would be significant and unavoidable at 2,509 lbs/day, 495 lbs/day, 658 lbs/day, and 178 lbs/day, respectively[8]. According to the Draft EIR, the Proposed Project would result in a maximum of 1-hour nitrogen dioxide (NO2) concentration of 264 micrograms per cubic meter (µg/m^3) during construction and 336 ug/m^3 during operation[9,10]. The Proposed Project's operational PM10 concentrations based on a 24-hour average and an annual average would be 6.2 µg/m^3 and 3.7 µg/m^3, respectively[11]. The Draft EIR includes a health risk assessment (HRA) and states that the Proposed Project would result in a decrease in cancer inhalation risk of 1 in one million during construction and a decrease in cancer inhalation risk of 4 in one million during operation[12,13], which would not exceed South Coast AQMD's CEQA significance threshold of 10 in one million for cancer risk[14].

South Coast AQMD staff's detailed comments on the Draft EIR are provided as follows.

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[6] Draft EIR. Section 4.1.1. Page 4.1.1-40.

[7] *Ibid.* Page 4.1.1-34.

[8] *Ibid.* Page 4.1.1-45.

[9] *Ibid.* Pages 4.1.1-51 and 52.

[10] Based on the air dispersion modeling that was performed to analyze the Proposed Project's localized air quality impacts, LAWA found that the Proposed Project would result in NO2 concentration of 0.027 (1-hour) and 0.264 (annual) parts per million (ppm) during construction and 0.033 (1-hour) and 0.336 (annual) ppm during operation. (Draft EIR. Section 4.1.1. Page 4.1.1-51 and 52). In the Appendix I: *Health Effects* of the 2016 AQMP, South Coast AQMD staff discussed a 2016 health study by the U.S. EPA. The study found that when adults with asthma are exposed to NO2 at the 100 parts per billion (ppb) to 300 ppb concentrations, they experienced an increase in airway responsiveness, which in asthmatics can worsen symptoms and reduce lung function. (Page I-54. Accessed at: https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/appendix-i.pdf).

[11] Draft EIR. Section 4.1.1. Page 4.1.1-52.

[12] *Ibid.* Appendix C: Air Quality, Human Health Risk Assessment, Greenhouse Gas Emissions, and Energy. Section 4: Protocol for Conducting an Air Quality Impact Analysis of Criteria Pollutants. Page 4-4.

[13] HRA based on a 30-year adult residential exposure scenario used to determine significance. *Ibid.* Page 4-6.

[14] South Coast AQMD's CEQA significance threshold of 10 in one million for cancer risk is based on the most current methodology recommended by the California Office of Environmental Health Hazard assessment.

1. CEQA Baseline

Under CEQA, baseline conditions exist at the time of the environmental review is initiated or as they exist at the time the Notice of Preparation (NOP) is published, if there is a published NOP. Notwithstanding this general rule, the Lead Agency has the discretion to define the existing physical conditions, supported by substantial evidence. To facilitate an EIR's role as an informational document, the use of future baseline is proper in some cases. "Thus, an agency may forego analysis of a project's impacts on existing environmental conditions if such an analysis would be uninformative or misleading to decision makers and the public." (*Neighbors for Smart Rail v. Exposition Metro Line Construction Authority* (2013) 57 Cal.4th 439). (See also CEQA Guidelines Section 15125(a)(2)). Consideration of future conditions in determining whether a project's impacts may be significant is consistent with CEQA's rules regarding baseline, especially when the project has a long-term buildout schedule. "[N]othing in CEQA law precludes an agency … from considering both types of baseline—existing and future conditions—in its primary analysis of the project's significant adverse effects." (*Neighbors for Smart Rail*, supra, 57 Cal.4th 439, 454). "Even when a project is intended and expected to improve conditions in the long term—20 or 30 years after an EIR is prepared—decision makers and members of the public are entitled under CEQA to know the short- and medium-term environmental costs of achieving that desirable improvement. … [¶] … The public and decision makers are entitled to the most accurate information on project impacts practically possible, and the choice of a baseline must reflect that goal." (See also *Communities for a Better Environment v. South Coast Air Quality Management Dist.* (2010) 48 Cal.4th 310).

The Draft EIR calculates the Proposed Project's operational emissions and makes two comparisons (Comparisons A and B). In Comparison A, the Proposed Project's operational emissions at the expected buildout scenario (year 2028) calculated with 2028 emission factors for on-road mobile sources are compared to the existing baseline conditions (year 2018) calculated with 2018 emission factors for on-road mobile sources. In this comparison, the Proposed Project would result in long-term significant adverse air quality impacts on regional emissions from NOx, SOx, PM10, and PM2.5, but not from VOCs. The Draft EIR uses the results from Comparison A to determine the significance level for the Proposed Project's regional air quality impacts during operation. However, when the future conditions are used (Comparison B), the Proposed Project would result in long-term significant adverse air quality impacts on regional VOCs emissions, but not on regional NOx, SOx, PM10, and PM2.5 emissions. The Draft EIR includes the results from Comparison B for informational purposes only and does not use them to determine the significance level for the Proposed Project's regional air quality impacts during operation.

The Draft EIR's approach using Comparison A between the Proposed Project's emissions in the future year (using emission rates from year 2028) and the emissions from the baseline (using emission rates from year 2018) improperly credits the Proposed Project with emission reductions that will occur independently of the Proposed Project due to adopted federal and state rules and regulations on clean vehicles and fuel technologies, since these rules, regulations, and technologies are expected to reduce mobile source emissions and improve air quality over time, even in the absence of the Proposed Project. For example, the California Air Resources Board's (CARB)

current regulation for trucks and buses will provide significant near-term and long-term reductions in NOx emissions from trucks and buses, at 98 tons per day for 2023[15].

Using future conditions is reasonable and proper to determine the significance level for the Proposed Project's operational air quality impacts based on the change in activities due to the Proposed Project. Since the Draft EIR has already performed the air quality analysis based on future conditions with the Proposed Project and without the Proposed Project (Comparison B), the Final EIR should use it to determine the significance level for the Proposed Project's regional air quality impacts during operation, or provide an explanation on the rationale for selecting Comparison A for a CEQA significance determination purpose but not selecting Comparison B when Comparison B shows the Proposed Project will have a significant adverse air quality impact on regional VOCs emissions.

2. Air Dispersion Modeling Parameter

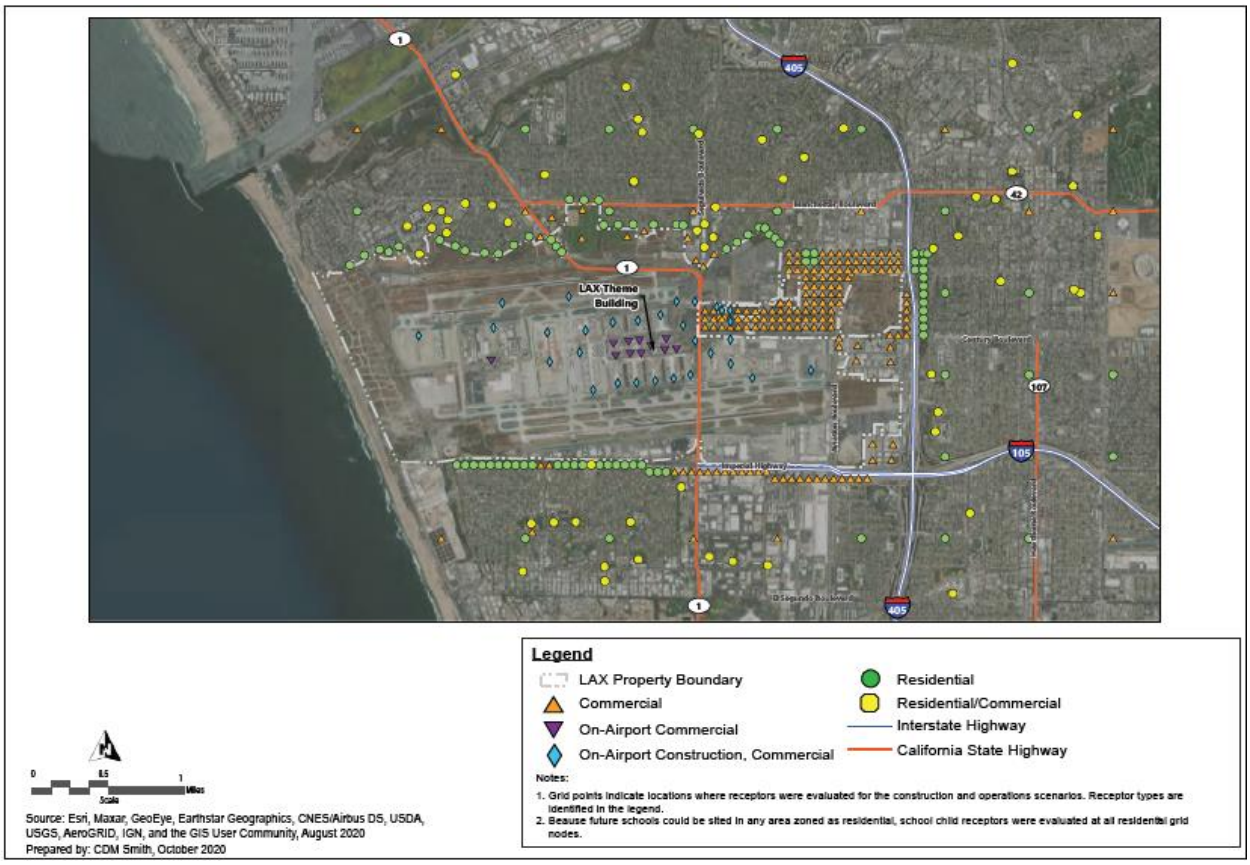
To analyze the Proposed Project's localized air quality impacts and HRA, the Draft EIR performs project-specific air dispersion modeling. The Draft EIR states that sensitive receptor locations were determined in a manner that would identify peak ambient air pollutant impacts associated with the Proposed Project[16]. The Draft EIR also states that initial off-site sensitive receptors will have a 100-meter spacing, and that refined sensitive receptors will be placed immediately around the initial impact location using a 25-meter spacing to verify the ultimate peak concentrations have been identified[17]. Based on a review of the air dispersion modeling files, South Coast AQMD staff found that sensitive receptors are placed at the fence line with a 100-meter spacing, that a uniform Cartesian receptor grid with a spacing of 100 meters is used to the northeast of the LAX property boundary over the rental car facility, and that various discrete receptors are placed beyond the LAX property boundary (see Figure 1). The receptor grid that is placed to the northeast of the LAX property boundary might not have been large enough to identify the maximum off-site concentrations. Therefore, South Coast AQMD staff recommends that the Final EIR provide additional information to justify the receptor grid used or perform additional modeling with an expanded receptor grid.

[15] California Air Resources Board. July 14, 2017. Trucks and Bus Regulation: On-Road Heavy-Duty Diesel Vehicles (In-Use) Regulation. Accessed at: https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm, and https://www.arb.ca.gov/msprog/onrdiesel/documents/truckrulehealth.pdf.

[16] Draft EIR. Section 4.1.1. Pages 4.1.1-14.

[17] *Ibid.* Appendix C. Section 4. Page 4-4.

Figure 1: South Coast AQMD Staff's Copy of Figure 4.1.2-1, Construction and Operations Grid Point Locations from Draft EIR



3. Responsible Agency and South Coast AQMD Permits

The Draft EIR states that South Coast AQMD has authorities to issue permits to construct and permits to operate for stationary sources[18]. The Draft EIR also includes a discussion of South Coast AQMD Rules, including Rule 403 – Fugitive Dust[19] and Rule 1113 – Architectural Coatings[20].

Based on a review of the Draft EIR, the Proposed Project will use rock crushing equipment during construction, and emergency generators, fire hydrant technologies, and fuel storage tanks during operation. If permits from South Coast AQMD are required, South Coast AQMD should be identified as a Responsible Agency in the Final EIR (CEQA Guidelines Section 15381). If additional stationary equipment will require permits from South Coast AQMD, the Final EIR should identify them in the Project Description and Air Quality Sections, where appropriate (e.g., if a Jet A fuel storage tank has a liquid fuel storage capacity greater than 40,000 gallons, a South Coast AQMD permit may be required pursuant to South Coast AQMD Rule 219[21]). The

[18] Draft EIR. Section 2. Page 2-85.
[19] South Coast AQMD Rule 403 – Fugitive Dust. Accessed at: http://www.aqmd.gov/docs/default-source/rule-book/outdated-sip-rules/rule-403-fugitive-dust.pdf.
[20] South Coast AQMD Rule 1113 – Architectural Coatings. Accessed at: http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf.
[21] South Coast AQMD Rule 219 – Equipment not Requiring A Written Permit Pursuant to Regulation II. Accessed at: http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-219.pdf.

assumptions in the air quality analysis in the Final EIR will be the basis for evaluating the permit under CEQA and imposing permit conditions and limits. Questions on permits can be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385. For more general information on permits, please visit South Coast AQMD's webpage[22].

Conclusion

Pursuant to California Public Resources Code 21092.5(a) and CEQA Guidelines 15088(b), South Coast AQMD staff requests that LAWA provide South Coast AQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. 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 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and to the public who are interested in the Proposed Project.

[22] South Coast AQMD. Permits. Accessed: http://www.aqmd.gov/home/permits.