



South Coast  
Air Quality Management District

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E-MAILED: NOVEMBER 14, 2008

November 14, 2008

Mr. Dennis Quilliam  
Airport and Facilities Planning  
Los Angeles World Airports  
7301 World Way West, 3<sup>rd</sup> Floor  
Los Angeles, CA 90045-5803

**Draft Environmental Impact Report (Draft EIR) for the Proposed Los Angeles International Airport Crossfield Taxiway Project**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The SCAQMD would also like to thank the lead agency for the additional time to submit comments. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final Environmental Impact Report.

Pursuant to Public Resources Code Section 21092.5, please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final Environmental Impact Report. The SCAQMD staff would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

*Steve Smith*

Steve Smith  
Program Supervisor – CEQA Section  
Planning, Rule Development & Area Sources

Attachment

SS:GM

LAC080926-07  
Control Number

### **Localized Significance Thresholds**

1. The SCAQMD requests that the lead agency evaluate localized air quality impacts to ensure that any nearby sensitive receptors are not adversely affected by the construction activities that are occurring in close proximity. SCAQMD guidance for performing a localized air quality analysis can be found at the following web address: <http://www.aqmd.gov/ceqa/handbook/LST/LST.html> .

### **Construction Mitigation Measures**

2. Because the construction air quality impacts from the proposed project are estimated to exceed established daily significance thresholds for carbon monoxide (CO), fugitive dust (PM10), volatile organic compounds (VOC) and nitrogen oxide (NO<sub>x</sub>), the SCAQMD recommends that the lead agency consider should consider adding the following mitigation measures to those listed on pages 4-70 and 4-71 in Tables 4.2-6 and 4.2-7 in Volume 1 of the Draft EIR to further reduce construction air quality impacts from the project, if applicable and feasible:

The following is a list of additional recommended mitigation measures to further reduce fugitive dust cumulative significant adverse PM10 impacts:

- Install wheel washers where vehicles enter and exit the construction site onto paved roads or wash off trucks and any equipment leaving the site each trip.
  - Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 mph;
  - All trucks hauling dirt, sand, soil, or other loose materials are to be covered;
  - Traffic speeds on all unpaved roads to be reduced to 15 mph or less; and
  - Sweep streets at the end of the day if visible soil is carried onto adjacent public paved roads (recommend water sweepers with reclaimed water).
3. The following mitigation measure is recommended to further reduce project-specific and cumulative NO<sub>x</sub> emission impacts:
    - Use SCAQMD Rule 2449 – Control of Oxides of Nitrogen from Off-Road Diesel Vehicles, compliant construction equipment.

### **SCAQMD Permit Requirements**

4. In the Draft EIR, the lead agency describes concrete batching and aggregate rock crushing operations that might require SCAQMD permits. The lead agency should be aware that concrete batch and aggregate rock crushing operations are subject to the following rules and should note this in the Final EIR.

- Rule 1156 – PM10 Emission Reductions from Cement Manufacturing Facilities;
- Rule 1157 - PM10 Emission Reductions from Aggregate and Related Operations; and
- Regulation XIII – New Source Review.

### **Health Risk Assessment**

5. In the Draft EIR, the lead agency states that the incremental health risks due to inhalation of TACs from operational sources associated with four build alternatives and the No Action/No Project Alternative was addressed in the LAX Master Plan Final EIR on page 4-77. There appears to be no further discussion of potential health risks from operation. SCAQMD staff assumes that a formal HHRA for operational impacts was not prepared because the project results in a reduction of overall emission reductions. It would be helpful if the lead agency summarized the operational HHRA health risk results from the Final Program EIR for the LAX Master Plan and provide a better explanation in the Final EIR why an HHRA for the project operation was not prepared.
6. The daily breathing rate used for the health risk assessment is 285 L/kg-day (20 m<sup>3</sup>, 70 kg). SCAQMD staff suggests using the breathing rate of 302 L/kg-day from ARB Recommended Interim Risk Management Policy for Inhalation-Based Residential Cancer Risk (<http://www.arb.ca.gov/toxics/harp/docs/rmpolicy.pdf>).