South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

E-mailed: August 31, 2010 August 31, 2010
Maria.Martin@lacity.org

Ms. Maria Martin
Department of Public Works
City of Los Angeles
1149 S. Broadway, Suite 600, Mail Stop 939
Los Angeles, CA 90015-2213

**Review of the Draft Environmental Impact Report (EIR)
for the Proposition O Echo Park Lake Rehabilitation Project**

The South Coast Air Quality Management District (AQMD) 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 environmental document as appropriate.

Based on a review of the draft EIR the AQMD staff is concerned about the significant regional construction air quality impacts and the potential for odor impacts from the proposed project. In order to reduce regional air quality impacts, AQMD staff recommends that the lead agency require additional mitigation to reduce diesel equipment exhaust emissions during construction activities. Also, AQMD staff is concerned that odor impacts from the drying/decomposition of lake sediments during project construction may be underestimated. Although the lead agency has determined that implementation of mitigation measures AIR-E through AIR-G will result in less than significant odor impacts, it is unclear to AQMD staff how these measures will reduce potential impacts to a less than significant level. Further, AQMD staff notes that the potential health impacts from pollutants emitted during the drying/ decomposition of lake sediments are not addressed in the Health Risk Assessment (HRA). AQMD staff recommends that the lead agency conduct additional analysis of the drying/ decomposition of lake sediments in order to justify the significance determination and the effectiveness of the proposed mitigation measures. Finally, the AQMD notes that there are several inconsistencies in the localized significance threshold (LST) and HRA analysis and emissions calculations. Given that the lead agency estimates that there could be up to 85 trucks per day visiting the site, and ten pieces of construction equipment operating onsite AQMD staff requests that the lead agency revisit the localized significance analysis and HRA based on the attached comments.

AQMD staff is available to work with the lead agency to address these issues and any other questions regarding air quality 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,

Ian MacMillan
Program Supervisor, CEQA Inter-Governmental Review
Planning, Rule Development & Area Sources

Attachment

IM:DG

LAC100715-03
Control Number

Regional NOx Mitigation Measures

1. In Section 3.2 (Air Quality) the lead agency evaluated the potential regional air quality impacts from construction activities that will occur at the project site. The lead agency's air quality analysis demonstrates that Oxides of Nitrogen (NOx) emissions from the proposed project exceed the AQMD's daily regional construction significance threshold. As a result, the lead agency has proposed mitigation measures AIR-A through AIR-D in the draft EIR to reduce the NOx emissions from the project, however, the project's air quality impacts remain significant. Therefore, the AQMD staff recommends that the lead agency consider revising mitigation measure AIR-D to further reduce NOx air quality impacts from the construction phase of the project. Specifically, AQMD staff recommends that the lead agency revise mitigation measure AIR-D as follows:

   AIR-D All diesel-powered construction equipment in use shall require control equipment that meet~~s at a minimum~~ the highest Tier of ~~III~~ emission standards available ~~requirements In the event Tier III equipment is not available, diesel powered construction equipment in use shall require emissions control equipment with a minimum of Tier II diesel standards~~.

Odor/Hydrogen Sulfide Threshold of 10 parts per billion

2. Based on AIR-4 in Section 3.2 (Air Quality) the proposed project includes the removal of sediment and other organic materials from the lake bed. Once the lake is drained the sediments will be dried for one to two months. On page 3.2-29 of the draft EIR, the lead agency states that this drying/decomposition process will result in significant odor emissions that will be in close proximity to sensitive receptors (i.e., residences). In order to address this significant impact the lead agency proposes several mitigation measures including monitoring for hydrogen sulfide, establishing a performance standard of 10 ppb at the site fence-line for hydrogen sulfide, application of lime and oxidizing agents to soils, and creation of a $50,000 odor contingency fund. While these measures may reduce some odors, the explanation provideed in the draft EIR does not demonstrate that these measures will reduce odor impacts to a less than significant level. For example, if odors from compounds other than hydrogen sulfide are generated during sediment drying, and no additional measures to reduce these odors are feasible for less than $50,000, then the project will have a significant impact. Even if the lead agency determines that the stated measures are the only feasible mitigation, it has not yet demonstrated that the impacts will be less than significant. Therefore, AQMD staff requests that the lead agency provide additional information to substantiate the effectiveness of the above mentioned measures.

Additional Mitigation for Significant Odor Impacts

3. Given that the drying/decomposition process of organic material from the project's lake bed will result in significant odor emissions in close proximity to sensitive receptors (i.e., residences) AQMD staff recommends additional mitigation to further reduce odor impacts. Specifically, AQMD staff recommends that in addition to the elements required by mitigation measure AIR-E the lead agency shall include

mitigation consistent with elements #6 (Contact Sign) and #7 (Written Log of Odor Complains) of the requirements set forth in Appendix A of AQMD Rule 410.

Localized Impacts Analysis/Health Risk Assessment (HRA) Acreage Assumptions

4. On page 23 and 24 of Section 3.2 (Air Quality) the lead agency summarizes the localized air quality impacts from the proposed project. The localized air quality impacts analysis assumes that the proposed project will include five acres of construction activity per day; however, the HRA assumes that the proposed project will include 24 acres of disturbance per day. As a result, AQMD staff is concerned that the localized air quality and health risk impacts may be underestimated. Therefore, AQMD staff requests that the lead agency revise the localized air quality analysis and/or the HRA for consistency and to accurately reflect the project's construction activity with respect to the daily area of construction activity (i.e., five acres or 24 acres).

Health Risk Impacts from Drying Lake Sediments

5. The lead agency conducted a HRA to determine the potential health risks from the proposed project. Specifically, in AIR-3 of Section 3.2 (Air Quality) in the draft EIR the lead agency analyzed the cancer risks from diesel emissions associated with construction activities at the project site. However, the lead agency failed to discuss the potential health risk impacts from the pollutants (e.g., hydrogen sulfide) emitted during the drying of the lake sediments that will be removed as part of the proposed project (discussed in Impact AIR-4). Therefore, AQMD staff recommends that the lead agency revise the HRA to include any potential health risks that may result from the decomposition/drying of the lake sediments.

Potential Conflict between AQMD Rule 403 and proposed Drying of Lake Sediments

6. The LST analysis assumes compliance with AQMD Rule 403, which includes watering sediments to reduce dust. The lead agency should discuss any potential conflicts between the proposed remediation of lake sediments by drying and implementation of Rule 403.

Haul Truck Emission Rates

7. The truck trip emissions appear to be underestimated based on the modeling files and emission calculation worksheets provided to AQMD staff. The emission calculation [Cell E15 of tab 'HRA Input'] assumes emissions occur 24 hours per day; however the dispersion model uses the hourly scalar function to turn off emissions for 16 hours per day. Thus the lower 24-hour emission rate is only applied for 8 hours per day. The lead agency should revise this analysis to include all emissions in the HRA.

Construction Equipment Emission Rates

8. The reasoning behind the construction equipment emission factors is unclear. The 'Heavy Equipment' emissions factors cited on row 17 of the 'Emissions Factors' worksheet appears to be derived from the OFFROAD2007 'Other Material Handling Equipment' composite factor. It is unclear why this equipment category was chosen as other equipment with higher emission factors may be more appropriate. For example, a 500 horsepower grader has a NOx emission factor of 1.96lb/hr, nearly 30 percent higher than the 1.515lb/hr emissions factor used by the lead agency in its analysis. AQMD staff requests that the lead agency provides further justification for its use of this factor, or revise the analysis to include more specific information.