



# South Coast Air Quality Management District

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**FAXED: JULY 25, 2006**

July 25, 2006

Robert Kanter, Ph.D.  
Port of Long Beach  
Planning Division  
925 Harbor Plaza  
Long Beach, CA 90801

Dear Dr. Kanter:

**Reissued Notice of Preparation for the Gerald Desmond Bridge  
Replacement Project and Air Quality Analysis Protocol for the Gerald Desmond  
Bridge Replacement Project**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned documents. The SCAQMD staff apologizes for not submitting comments earlier and appreciates the additional time that the Port of Long Beach has allowed. The Gerald Desmond Bridge Replacement Project is an important part of the Ports future expansion plans as this bridge is the primary route between the Port of Long Beach and the Port of Los Angeles and the 710 Freeway. In addition, the Gerald Desmond Bridge Replacement Project will be expanded from four to six lanes accommodating future car and truck traffic volume, and will provide vertical clearance for larger marine vessels.

The SCAQMD staff strongly recommends that the lead agency use the 10 in a million cancer risk threshold to determine project and cumulative significance. Using a percent increase in toxic emissions to determine if a Health Risk Assessment is needed or if the project is cumulatively significant is not an appropriate methodology. The Port of Long Beach's proposed approach is based on a Basin-wide average risk and does not account for many of the key variables that will determine the maximum individual cancer risk such as meteorological conditions, distance to the receptor, exposure duration, and potency of the toxic air contaminant. The SCAQMD staff is concerned that the project may pose a health risk that exceeds the 10 in a million significance threshold, however, the emissions are below the Port of Long Beach's recommended average screening emissions.

In calculating the health risk, the lead agency should account for all new impacts associated with implementation of the proposed project. If the Desmond Gerald Bridge

will be placed in a different location that will affect existing traffic routes, the SCAQMD staff would view these as new localized impacts and the health risk should be appropriately quantified from all mobile sources on the bridge, bridge approaches, and from traffic routes associated with the bridge. In addition, localized impacts from the larger ships that would be able to pass under the taller proposed bridge should also be considered as this is an anticipated activity associated with the proposed project. The SCAQMD staff recognizes that the methodology for estimating regional and localized impacts may be different. The methodology for estimating regional emissions should assess the incremental increase in emissions on a regional basis that are associated with the proposed project.

In February 2006, the SCAQMD staff provided comments to the Port of Long Beach on their *Draft Air Quality and Risk Assessment Protocol for Proposed Projects at the Port of Long Beach Dated October 17, 2005*. SCAQMD staff comments on the Air Quality and Risk Assessment Protocol are incorporated by reference. Please find additional, more detailed comments on the Gerald Desmond Bridge Project-Specific Air Protocol in Attachment I.

The SCAQMD staff appreciates the opportunity to work with the Port of Long Beach to ensure that project-related emissions are accurately identified, categorized and evaluated. Please call me at 909 396-3105 if you have any questions regarding this letter.

Sincerely,

Susan Nakamura  
Planning & Rules Manager

## Attachment I

### General Comments

1. The Protocol should reference recent South Coast Air Quality Management District (AQMD) Guidance – The following two guidance documents developed recently by AQMD staff should be referenced and followed in the protocol:
  - a. *Supplemental Guidelines for Preparing Risk Assessments to Comply with the Air Toxics “Hot Spots” Information and Assessment Act (AB2588)*. The document is available at:  
[http://www.aqmd.gov/prdas/AB2588/pdf/AB2588\\_Guidelines.pdf](http://www.aqmd.gov/prdas/AB2588/pdf/AB2588_Guidelines.pdf). This document is a supplement to OEHHA’s document entitled, “Air Toxics Hot Spots Program Risk Assessment Guidelines” (referred to as the OEHHA Guidelines). Facilities required to submit risk assessments to the AQMD must follow the OEHHA Guidelines. While the information provided in the OEHHA Guidelines is complete, there are several areas in which the user is referred to their local air districts for specific or additional requirements. This supplemental guidance addresses those and other issues that have arisen during the implementation of the AB2588 Program and various AQMD toxic rules.
  - b. *Health Risk Assessment Guidance for Railyards and Intermodal Facilities*. The document is contained in the October Board package for Rule 3503 (agenda item #27). The document provides dispersion modeling and health risk assessment guidance for railyard and intermodal facilities. (Includes methodology for analyzing mobile sources)
  - c. Guidance for performing a mobile source health risk assessment (“Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis”) which can be found at the following SCAQMD website:  
[www.aqmd.gov/ceqa/handbook/mobile\\_toxic/mobile\\_toxic.html](http://www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.html).
2. The SCAQMD staff has developed a methodology to quantify localized emissions impacts from PM<sub>10</sub>, CO, and NO<sub>x</sub> emissions. Please refer to the SCAQMD’s website for the methodology and localized significance thresholds for PM<sub>10</sub>, CO, and NO<sub>x</sub>.
3. PM<sub>2.5</sub> Impacts – The criteria pollutant, PM<sub>2.5</sub>, is not considered in the protocol. The protocol must address PM<sub>2.5</sub> emissions and impacts. As you are aware, the SCAQMD staff is in the process of developing PM<sub>2.5</sub> CEQA significance thresholds for both regional and localized impact analyses. Staff intends to bring the recommendation to the Governing Board in October 2006.
4. Mitigation Measures - If air quality or health risk impacts are found to be significant, the Port must require implementation of mitigation measures by all applicable sources unless substantial evidence supports a finding that implementation of a measure is not feasible. (Cal. Pub. Res. Code §§21081, 21081.5). The following documents contain feasible mitigation measures that the Port must consider for projects with significant

air quality impacts. In addition, the AQMD staff will identify additional mitigation measures during the review of a specific proposed project.

- SCAQMD's "Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis". March 28, 2003. [http://www.aqmd.gov/ceqa/handbook/mobile\\_toxic/mobile\\_toxic.html](http://www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.html)
- Riverside Air Quality Task Force "Good Neighbor Guidelines", September 12, 2005. <http://www.wrcog.cog.ca.us/publications/Good+Neighbor+Policies+Final-091205.pdf>
- California Environmental Protection Agency, "Draft Emission Reduction Plan for Ports and International Goods Movement in California", December 1, 2005. [http://www.arb.ca.gov/planning/gmerp/dec1plan/cover\\_toc.doc](http://www.arb.ca.gov/planning/gmerp/dec1plan/cover_toc.doc)
- Chapter 11 of the SCAQMD CEQA Air Quality Handbook has sample air quality mitigation measures.
- SCAQMD's Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning. This document can be accessed at the following internet address: [www.aqmd.gov/prdas/aqguide/aqguide.html](http://www.aqmd.gov/prdas/aqguide/aqguide.html).

In addition, pursuant to CEQA Guidelines Section 15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be addressed.

5. Project Emissions - Quantification of project emissions for the air quality analysis for CEQA documents should include project related emissions for both indirect and direct sources that affect California. For example, if the proposed project will create an increase in truck trips where deliveries would be outside of the SCAB, the emissions from the increase in truck trips from the project site to the edge of California should be included in the air quality analysis. Emission estimates for the HRA would be limited to those emissions that occur within the proposed project boundaries.
6. Peak Daily Emissions – The protocol states on page 7, that "to calculate the worst-case interim emission, the air emissions associated with each of these phases will be calculated separately." It would seem that there is the potential for overlapping phases, for example the demolition of the existing bridge and operation of the new bridge. The emissions from each phase and overlapping of phases should be calculated to estimate the peak daily construction and demolition emissions.
7. Future Mobile Source Regulations - For rules adopted or amended after the EMFAC2002 model was developed, the effect of future requirements can be accounted for in the future emission estimates provided the methodology and assumptions used is reviewed and approved by the local and state air quality agencies. This is to ensure that there is not a discrepancy regarding how future emission reductions are accounted and that there is potential double counting of emission reductions. In addition, it should be clear the SCAQMD CEQA guidance allows project to take credit for future year emission reductions from adopted rules and regulations only. Adjustments for proposed rules and regulations are not allowed.

8. Off-road Emissions - Emission factors from ARB's OFFROAD model for the years of interest represent model year emission factors, not fleet averages for the specified year. It appears that the authors are aware that the OFFROAD model is for model year engines and not fleet averages, but it should be made clearer in the discussion. CARB can provide emission factors that are representative of the overall fleet-mix for a specific equipment type and size category, or the Port use OFFROAD emission factors representative of their specific fleet for a specific equipment type and size category and model year. The second approach will allow the Port to tailor the fleet of equipment used in a specific project based on the useful life of each piece of equipment used at the Port.
9. Ocean-going vessels (OGVs) – OGVs can be treated as a series of point, area, or volume sources. The subject protocol is considering either a point or volume source treatment. Either treatment is acceptable. However, ARB's concurrence should be sought since ARB uses an area source treatment for OGVs in their report titled, *Diesel Particulate Matter Exposure Assessment Study for the Ports of Los Angeles and Long Beach*. In addition, if OGVs are treated as a series of point sources, then the approach must address potential building downwash effects.
10. Modeling Domain – Typically, SCAQMD staff requires impacts to be evaluated beginning from the fence line. It is not clear from the protocol where project impacts would begin to be evaluated. This issue should be discussed in the protocol.
11. Time Domain for the Quantitative HRA – It is not clear from the protocol what the time domain for the quantitative HRA is. Would the HRA include emissions from the interim years or would the build-out emissions be assumed for the HRA?
12. Wilmington meteorological site is preferable for a Port of Long Beach impact assessment. It was used by ARB in their Port HRA and is proposed for use by the Port of Los Angeles for their expansion projects. In addition it is more current and proximate to the proposed project than SCAQMD's North Long Beach site.
13. Exposure assumption – The SCAQMD staff recommends that the exposure duration for schools and day care facilities assume 70 years, if the SCAQMD's significance threshold is used.
14. OEHHA Reference – The date for the OEHHA reference should be August 2003.

SCAQMD rules and relevant air quality reports and data are available by calling the SCAQMD's Public Information Center at 909 396-2039. Much of the information available through the Public Information Center is also available via the SCAQMD's website: [www.aqmd.gov](http://www.aqmd.gov).