



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL AND USPS:

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eedwards@carson.ca.us

Ethan Edwards, Planner

City of Carson – Community Development Department, Planning Division

701 East Carson Street,

Carson, CA 90745

Draft Supplemental Environmental Impact Report (Draft SEIR) (SCH No. 2005051059) for the Proposed District at South Bay Specific Plan

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

SCAQMD Staff's Summary of Project Description and Air Quality Analysis

The Lead Agency proposes to develop 1.6 million square feet (s.f.) of commercial space, 1,250 residential units, and two hotels (Proposed Project). The Proposed Project is sited on a former landfill/brownfield site with VOC contaminated soil and groundwater. In the Air Quality Section, the Lead Agency quantified the Proposed Project's construction and operational emissions and compared those emissions to SCAQMD's regional and localized air quality CEQA significance thresholds to determine the significance of air quality impacts. Based on the analyses, the Lead Agency found that the Proposed Project's construction and operational air quality impacts from NO_x, ROG, CO, PM₁₀, and PM_{2.5} emissions would be significant and unavoidable after mitigation¹.

General Comments

On March 3, 2017, the SCAQMD's Governing Board adopted the 2016 Air Quality Management Plan (2016 AQMP)², which was later approved by the California Air Resources Board on March 23, 2017. Built upon the progress in implementing the 2007 and 2012 AQMPs, the 2016 AQMP provides a regional perspective on air quality and the challenges facing the South Coast Air Basin. The most significant air quality challenge in the Basin is to achieve an additional 45 percent reduction in nitrogen oxide (NO_x) emissions in 2023 and an additional 55 percent NO_x reduction beyond 2031 levels for ozone attainment.

The Proposed Project plays a role in contributing to Basin-wide NO_x emissions. As described above, achieving NO_x emission reductions in a timely manner is critical to attaining the National Ambient Air Quality Standard (NAAQS) for ozone before the 2023 and 2031 deadlines. SCAQMD is committed to attaining the ozone NAAQS as expeditiously as practicable. To further reduce NO_x, ROG, and Particulate Matter emissions during construction and operation, the attachment includes additional mitigation measures which the Lead Agency should include in the Final SEIR. The attachment also includes comments on SCAQMD rules.

Pursuant to Public Resources Code Section 21092.5 and CEQA Guidelines Section 15088, SCAQMD staff requests that the Lead Agency provide SCAQMD with written responses to all comments contained herein prior to the certification of the Final SEIR. Further, when the Lead Agency makes the finding that

¹ Draft SEIR. Section IV.G – Air Quality.

² South Coast Air Quality Management District. March 3, 2017. *2016 Air Quality Management Plan*. Accessed at: <http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan>.

the recommended mitigation measures are not feasible, the Lead Agency shall describe the specific reasons for rejecting them in the Final SEIR (CEQA Guidelines Section 15091).

SCAQMD staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Jack Cheng, Air Quality Specialist, CEQA IGR Section, at (909) 396-2448, if you have any questions regarding the enclosed comments.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment

LS:JC

LAC171017-06

Control Number

ATTACHMENT

Additional Mitigation Measures to Further Reduce Construction and Operational Emissions

1. CEQA requires that all feasible mitigation measures go beyond what is required by law to minimize any significant impacts. To further reduce the significant construction and operational emissions, particular from NO_x, VOCs, and Particulate Matters, SCAQMD staff recommends the following mitigation measures that the Lead Agency should include in the Final SEIR. Additional information on potential mitigation measures as guidance to the Lead Agency is available on the SCAQMD CEQA Air Quality Handbook website³.

Mitigation Measures for Construction Activities

2. All off-road diesel-powered construction equipment shall meet or exceed Tier 4 off-road emissions standards. A copy of the fleet's tier compliance documentation, and CARB or SCAQMD operating permit shall be provided to the Lead Agency at the time of mobilization of each applicable unit of equipment. In the event that all construction equipment cannot meet the Tier 4 engine certification, the applicant must demonstrate through future study with written findings supported by substantial evidence that is approved by the Lead Agency before using other technologies/strategies. Alternative measures may include, but would not be limited to, reduction in the number and/or horsepower rating of construction equipment, limiting the number of daily construction haul truck trips to and from the Proposed Project, using cleaner vehicle fuel, and/or limiting the number of individual construction project phases occurring simultaneously.
3. Require the use of 2010 model year diesel haul trucks that conform to 2010 EPA truck standards or newer diesel haul trucks (e.g., material delivery trucks and soil import/export), and if the Lead Agency determines that 2010 model year or newer diesel haul trucks are not feasible, the Lead Agency shall use trucks that meet EPA 20017 model year NO_x emissions requirements, at a minimum.
4. Require additional particulate matter mitigation measures such as those identified in Tables 2 and 3 from SCAQMD Rule 403- Fugitive Dust⁴.

Mitigation Measures for Operational Activities

5. The Lead Agency should incorporate the following mitigation measures to further reduce the Proposed Project's significant operational air quality impacts.
 - a) Limit parking supply and unbundle parking costs.
 - b) Require that 240-Volt electrical outlets or Level 2 chargers be installed in residential garages on-site that would enable charging of NEVs and/or battery powered vehicles.

Compliance with SCAQMD Rule 1166

6. As described above, the Proposed Project is sited on a former landfill/brownfield site with VOC contaminated soil and groundwater. In the event that VOC contaminated soil is encountered, SCAQMD staff recommends that the Lead Agency include a discussion to demonstrate compliance with the requirements of SCAQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil in the Final SEIR.

³ South Coast Air Quality Management District. <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.

⁴ SCAQMD Rule 403 – Fugitive Dust. <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf>.