

SENT VIA USPS AND E-MAIL:

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**Mitigated Negative Declaration (MND) for the Proposed
California State University, Long Beach (CSULB) Technology Park Phase III Project**

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 MND.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to construct and operate a 205,060-square-foot, high-cube warehouse with unknown occupants on an approximately 10-acre site (Proposed Project). The Proposed Project is bounded by commercial uses to the north, east, south, and west.

Air Quality and Health Risk Assessment (HRA) Analyses

In the Air Quality Section, the Lead Agency quantified the Proposed Project's construction and operational emissions and compared them to SCAQMD's regional and localized air quality CEQA significance thresholds. The air quality analysis was based on approximately 730 total vehicle trips, including 208 daily truck trips¹. The Lead Agency found that regional and localized construction and operational emissions would be less than significant. Additionally, the Lead Agency performed a HRA and found that the Maximum Exposed Individual Resident cancer risk would be 3.8 in one million, which is below SCAQMD's CEQA significance threshold of 10 in one million for cancer risk².

SCAQMD staff has concerns about the HRA analysis in the MND. The analysis utilized assumptions which have likely led to an under-estimation of the Proposed Project's health risk impacts. Details are included in the attachment. After revising the HRA analysis, should the Lead Agency find that the Proposed Project's health impacts would exceed SCAQMD's CEQA significance thresholds, mitigation measures are required pursuant to the CEQA Guideline Section 15074(b). SCAQMD staff has included a list of mitigation measures in the attachment to assist the Lead Agency in identifying feasible mitigation measures which have the potential to substantially lessen such significant effects (Public Resources Code Section 21002).

¹ Draft Initial Study/Mitigated Negative Declaration, CSULB Technology Park Phase III, Page 3-16.

² Appendix A – Air Quality Modeling and Health Risk Assessment.

Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process. Please provide SCAQMD staff with written responses to all comments contained herein prior to the adoption of the Final MND.

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

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment

LS:JC

RVC170908-04

Control Number

ATTACHMENT

Health Risk Assessment (HRA) Analysis

1. The Lead Agency used the non-default Dispersion Coefficient option Rural in the dispersion modeling. SCAQMD modeling guidance requires the use of the Urban Option. SCAQMD staff recommends that the Lead Agency revise the HRA using the Urban Option or provide an explanation for justifying the use of the Rural Option.
2. Dock loading idling emissions were modeled as eight point sources. SCAQMD staff recommends that the Lead Agency revise the HRA using a series of volume sources that spans the entire docking area to account for idling diesel particulate matter (DPM) emissions and to ensure that impacts are properly analyzed.
3. The Lead Agency references the California Air Resources Board's EMFAC2014 Volume III-Technical Documentation – Table 3.2-41 Revised HHD Diesel Truck High Idle Emission Rates³ to calculate idling emissions. The 0.003 g/hr idling emission rate used in the analysis applies only to Heavy Duty Trucks model year 2009 and newer, which exclude trucks older than 2009. SCAQMD staff recommends that the Lead Agency revise the HRA using the EMFAC2014 – Emissions – Data Type (which includes 2009 and older model year trucks) to calculate idling emissions to ensure the emissions are not underestimated. Alternatively, the Lead Agency can commit to using 2009 or newer model year Heavy Duty Trucks as an enforceable mitigation measure.
4. SLINE1, SLINE2, SLINE3, SLINE4 offsite travel line volume sources have varying plume heights. SCAQMD staff recommends that the Lead Agency revise the HRA using a consistent plume height.
5. The Lead Agency did not include onsite travel sources. SCAQMD staff recommends that the Lead Agency revise the HRA to include onsite travel modeled as a series of volume sources to ensure that impacts are properly analyzed.

Additional Mitigation Measures for Operational Air Quality Impacts (Mobile Sources)

6. CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant impacts. In the event that the Lead Agency, after revising the HRA analysis based on the comments provided above, finds that the Proposed Project would result in significant adverse health risk impacts, SCAQMD staff recommends incorporating the following on-road mobile-source trucks related mitigation measures in the Final MND. For more information on potential mitigation measures as guidance to the Lead Agency, please visit SCAQMD's CEQA Air Quality Handbook website⁴.

³California Air Resources Board. <https://www.arb.ca.gov/msei/downloads/emfac2014/emfac2014-vol3-technical-documentation-052015.pdf>.

⁴ South Coast Air Quality Management District. <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.

- Require the use of 2010 and newer haul trucks (e.g., material delivery trucks and soil import/export). In the event that that 2010 model year or newer diesel haul trucks cannot be obtained, provide documentation as information becomes available and use trucks that meet EPA 2007 model year NOx emissions requirements⁵, at a minimum. Additionally, consider other measures such as incentives, phase-in schedules for clean trucks, etc.
- Have truck routes clearly marked with trailblazer signs, so that trucks will not enter residential areas.
- Limit truck trips to the amounts analyzed in the Final MND.
- Provide incentives to promote clean truck incentive programs. Provide electric vehicle (EV) Charging Stations (see the discussion below regarding EV charging stations).
- Trucks that can operate at least partially on electricity have the ability to substantially reduce the significant NOx impacts from this project. Further, trucks that run at least partially on electricity are projected to become available during the life of the project as discussed in the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy⁶. It is important to make this electrical infrastructure available when the project is built so that it is ready when this technology becomes commercially available. The cost of installing electrical charging equipment onsite is significantly cheaper if completed when the project is built compared to retrofitting an existing building. Therefore, SCAQMD staff recommends that the Lead Agency require the Proposed Project include the appropriate infrastructure to facilitate sufficient electric charging for trucks to plug-in. Similar to the City of Los Angeles requirements for all new projects, SCAQMD staff recommends that the Lead Agency require at least 5% of all vehicle parking spaces (including for trucks) include EV charging stations⁷. Further, electrical hookups should be provided at the onsite truck stop for truckers to plug in any onboard auxiliary equipment. At a minimum, electrical panels should appropriately sized to allow for future expanded use.

⁵ Based on a review of the California Air Resources Board's diesel truck regulations, 2010 model year diesel haul trucks should have already been available and can be obtained in a successful manner for the project construction California Air Resources Board. March 2016. Available at: <http://www.truckload.org/tca/files/ccLibraryFiles/Filename/000000003422/California-Clean-Truck-and-Trailer-Update.pdf> (See slide #23).

⁶ Southern California Association of Governments. Adopted April 7, 2016. Available at: <http://scagtrpccs.net/Pages/default.aspx>.

⁷ City of Los Angeles. March 30, 2017. Accessed at: http://ladbs.org/LADBSWeb/LADBS_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf.