



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:

June 11, 2019

Cuentin.Jackson@longbeach.gov

Cuentin Jackson, Planner
Development Services Department
City of Long Beach
333 West Ocean Boulevard, 5th Floor
Long Beach CA, 90802

Mitigated Negative Declaration (MND) for the Proposed 1601 San Francisco Avenue Project

South Coast Air Quality Management District (South Coast AQMD) 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.

South Coast AQMD Staff's Summary of Project Description

The Lead Agency proposes to demolish 11,750 square feet of existing buildings and construct two warehouses totaling 94,872 square feet on 3.93 acres (Proposed Project). The Proposed Project is located on the northwest corner of West Ocean Boulevard and Pacific Avenue within the City of Long Beach. Construction is anticipated to begin in 2019, and the Proposed Project will be operational by January 2020¹. During operation, the Proposed Project will generate 95 truck trips per day². Upon review of the MND and aerial photographs, South Coast AQMD staff found that sensitive receptors are within 1,050 feet of the Proposed Project³. The Proposed Project site is zoned by the City of Long Beach as "General Industrial" and permits uses such as chemical manufacturing. The site also has a land use designation as "General Industry", which allows for more intense industrial operations than those permitted under other industrial designations⁴.

South Coast AQMD Staff's Summary of the Air Quality Analysis

In the Air Quality Analysis Section, the Lead Agency quantified the Proposed Project's construction and operational emissions and compared those emissions to South Coast AQMD's recommended regional and localized air quality CEQA significance thresholds. The Lead Agency assumed the use of Tier 3 construction equipment and found that the Proposed Project's regional construction NO_x emissions would be reduced from 90 pounds/day (lbs/day)⁵ to 70 lbs/day⁶, which is below South Coast AQMD's air quality CEQA significance threshold for NO_x at 100 lbs/day⁷ during construction. The Lead Agency found that all other regional and localized air quality impacts would be less than significant⁸. Additionally, the Lead Agency included a discussion to demonstrate compliance with South Coast

¹ MND. Page 6.

² MND. Section 17 Transportation. Page 86.

³ MND. Section 3 Air Quality. Page 22.

⁴ MND. Section 11 Land Use and Planning Page 61.

⁵ MND. Appendix A: *Air Quality/Greenhouse Gas Modeling Results*. Annual, Summer, and Winter Runs.

⁶ *Ibid*. Page 23.

⁷ South Coast AQMD. CEQA Air Quality Significance Thresholds. Accessed at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>

⁸ MND. Section 3 Air Quality. Pages 21 through 26.

AQMD Rule 1403– Asbestos Emissions from Demolition/Renovation Activities⁹ during the Proposed Project's demolition phase¹⁰.

South Coast AQMD Staff's General Comments

Upon review of Appendix A: *Air Quality/Greenhouse Gas Modeling Results*, South Coast AQMD staff found that the Lead Agency quantified the Proposed Project's construction emissions with a modeling assumption that the Lead Agency is committed to full implementation and use of Tier 3 construction equipment during construction of the Proposed Project. However, upon review of the MND, South Coast AQMD staff found that the Lead Agency did not discuss the use of Tier 3 as a project requirement or mitigation measure. In order to be consistent with the modeling assumption, and to further reduce the Proposed Project's NOx emissions from construction, South Coast AQMD staff recommends that the Lead Agency require the use of Tier 4 construction equipment as a project requirement or mitigation measure in the Final MND. Please see the attachment for more information.

Permits and Compliance with South Coast AQMD Rules

The City of Long Beach's zoning and land use designation for the Proposed Project site allow manufacturing uses at the Proposed Project. In the event that the Proposed Project will be operated as a manufacturing facility, it is recommended that the Lead Agency consult with South Coast AQMD's Engineering and Permitting staff to determine if any permits from South Coast AQMD will be required for operation and equipment, and if compliance with applicable South Coast AQMD rules are required and should be discussed in the Air Quality Section of the Final MND. Any assumptions used in the Air Quality Analyses in the Final MND will be used as the basis for permit conditions and limits. If there is any information in the permitting process suggesting that the Proposed Project would result in significant adverse air quality impacts not analyzed in the Final MND, or substantially more severe air quality impacts than those analyzed in the Final MND, the Lead Agency should commit to reevaluating the Proposed Project's air quality and health risks impacts through a CEQA process (CEQA Guidelines Section 15162). Questions on permits and applicable South Coast AQMD rules can be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385. For more general information on permits, please visit South Coast AQMD's webpage at: <http://www.aqmd.gov/home/permits>.

Conclusion

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 South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, responses should provide sufficient details giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and the public who are interested in the Proposed Project. Further, if the Lead Agency makes a finding that additional recommended mitigation measure is not feasible, the Lead Agency should describe the specific reasons for rejecting or substituting the mitigation measures in the Final MND (CEQA Guidelines Section 15074.1).

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Alina Mullins, Assistant Air Quality Specialist, at amullins@aqmd.gov or (909) 396-2402, should you have any questions.

⁹ South Coast AQMD Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1403.pdf>.

¹⁰ MND. Section 9 Hazards and Hazardous Materials. Page 53.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment

LS:AM

LAC190521-02

Control Number

ATTACHMENT

Project Requirement or Mitigation Measure – Tier 4 Construction Equipment

1. Upon review of Appendix A: *Air Quality/Greenhouse Gas Modeling Results*, South Coast AQMD staff found that the Lead Agency assumed a full implementation and use of Tier 3 construction equipment as an air quality modeling assumption¹¹ to reduce NOx emissions to 70 lbs/day during construction¹². However, it did not appear that the Lead Agency included this requirement as a project requirement or mitigation measure in the main body of the MND. To further reduce the Proposed Project's NOx emissions during construction, South Coast AQMD staff recommends that the Lead Agency incorporate the following mitigation measure to require the use of Tier 4 construction equipment in the Final MND. To ensure that off-road construction equipment used will meet or exceed Tier 4 off-road engine emission standards during construction, South Coast AQMD staff recommends that the Lead Agency incorporate this requirement as a project requirement or mitigation measure as a condition of approval for the Proposed Project in the Air Quality Section of the Final MND rather than a mere modeling assumption in CalEEMod.

Mitigation Measure AQ-1: Require the use of off-road diesel-powered construction equipment that meets or exceeds the California Air Resources Board (CARB) and U.S. Environmental Protection Agency (USEPA) Tier 4 off-road emissions standards for equipment rated at 50 horsepower or greater during construction. Such equipment should be outfitted with Best Available Control Technology (BACT) devices including, but not limited to, a CARB certified Level 3 Diesel Particulate Filters (DPF). Level 3 DPFs are capable of achieving at least an 85 percent reduction in particulate matter emissions¹³. A list of CARB verified DPFs are available on the CARB website¹⁴. Additionally, the Lead Agency should include this requirement in applicable bid documents, and that successful contractor(s) must demonstrate the ability to supply compliant equipment prior to the commencement of any construction activities. A copy of each unit's certified tier specification and CARB or SCAQMD operating permit (if applicable) should be available upon request at the time of mobilization of each applicable unit of equipment. The Lead Agency should require periodic reporting and provision of written documentation by contractors to ensure compliance, and conduct regular inspections to the maximum extent feasible to ensure compliance. In the event that the Lead Agency finds that Tier 4 construction equipment is not feasible pursuant to CEQA Guidelines Section 15364, the Project representative or contractor must demonstrate through future study with written findings supported by substantial evidence that is reviewed and approved by the Lead Agency before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, Tier 3 construction equipment, 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, and/or limiting the number of individual construction project phases occurring simultaneously, if applicable. Any approved alternative technologies/strategies for use by the Lead Agency should be included and disclosed in the Air Quality Section of the Final MND as a project requirement or mitigation measure as a condition of approval.

¹¹ MND. Appendix A: *Air Quality/Greenhouse Gas Modeling Results*. Annual, Summer and Winter Runs.

¹² MND. Section 3 Air Quality. Page 23.

¹³ California Air Resources Board. November 16-17, 2004. *Diesel Off-Road Equipment Measure – Workshop*. Page 17. Accessed at: https://www.arb.ca.gov/msprog/ordiesel/presentations/nov16-04_workshop.pdf.

¹⁴ *Ibid*. Page 18.