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

FAXED: JUNE 16, 2005

June 16, 2005

Ms. Angela Reynolds
City of Long Beach
Department of Planning and Building
333 West Ocean Boulevard, 7th Floor
Long Beach, CA 90802

Draft Environmental Impact Report (DEIR) for Home Depot
(Long Beach, April 2005)

Dear Ms. Reynolds:

The South Coast Air Quality Management District (SCAQMD) 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 in the Final Environmental Impact Report.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Environmental Impact Report. The AQMD would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Charles Blankson, Ph.D., Air Quality Specialist – CEQA Section, at (909) 396-3304 if you have any questions regarding these comments.

Sincerely

Steve Smith, Ph.D.
Program Supervisor, CEQA Section
Planning, Rule Development & Area Sources

Attachment

SS:CB

LAC050504-02
Control Number

Draft Environmental Impact Report (DEIR) for Home Depot

1. **Fugitive Dust Emissions:** Table 4.2.J on page 4.2-28 shows peak grading emissions. Neither the DEIR nor Appendix B shows how the fugitive dust emissions were generated, what emission factors or equations were used, what assumptions were made, and what PM10 emission sources contributed to peak daily fugitive dust emissions. Without this information, the SCAQMD cannot confirm whether the peak daily fugitive dust estimates are accurate. Please provide this information in the footnotes or in the Appendix in the Final EIR.

2. **AirToxics Analysis**: The lead agency states on page 4.2-13 of the DEIR that there are currently no federal project-level requirements for air toxics analysis and that CEQA only requires a consideration of the risks from toxics but provides no guidance or quantitative analysis method. Please note that since the California Air Resources Board (CARB) identified particulate emissions from diesel-fueled engines as a toxic air contaminant in August 1998, the SCAQMD has approved a "Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis." This guidance document was released in March 2003 and is available on the SCAQMD website, as noted in the next comment.

3. **Diesel Toxics Analysis**: On page 4.2-25 of the DEIR and page 20 of Appendix B, the lead agency states that, based on comparison with the number of diesel truck trips in similar projects, potential impacts from air toxics impacts associated with the long-term use of diesel delivery trucks associated with the proposed project would be less than significant. There are two problems with this statement. First, no information or data are provided from the referenced project to demonstrate that potential air toxic impacts are similar to the proposed project. The discussion does not even say whether or not air toxic impacts from the referenced projects were concluded to be significant or insignificant. Further, an air toxics analysis is very site specific and depends on a number of factors including local meteorology, distance to the nearest sensitive receptor, and amount of emissions from the project location. Without providing this information and performing the proper analysis, the lead agency has not demonstrated that air toxics impacts associated with the project would be less than significant. Second, the lead agency does not provide any information or analysis on the number of trucks that would be servicing the facility at buildout and contributing to air toxics impacts. For example, review of the URBEMIS output files indicates that the proposed project may generate almost 130 heavy-heavy, and medium heavy-duty truck trips per day. Depending on the distance to the nearest sensitive receptor, the number of diesel truck trips could potentially create significant adverse air toxics impacts. Without providing information on the breakdown or listing of the vehicles by vehicle type that would be servicing the facility at buildout, how many of these vehicles will be heavy-duty diesel trucks, and the distance to the nearest sensitive receptor, the lead agency cannot conclude that potential impacts from air toxics associated with the long-term use of diesel delivery trucks would be less than significant. The SCAQMD recommends that the Final EIR include a mobile source

health risk assessment. Mobile source health risk assessment guidance can be found on the SCAQMD webpage at http://www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile>toxic.html.

4. **Reducing Operational Emissions**: According to Table 4.2.K on page 4.2-29 of the DEIR, operational CO, VOC and NO_X emissions all exceed the recommended operational significance thresholds. To reduce these emissions, the lead agency has proposed only five mitigation measures that are listed on page 4.2-32 of the DEIR. To further reduce project emissions, SCAQMD staff recommends the following mitigation measures for consideration by the lead agency:

- Require trucks to be offloaded promptly to prevent trucks idling for longer than five minutes.
- Require company-owned trucks use alternative clean fuel such as compressed natural gas, or where diesel trucks have to be used, have trucks use particulate filters, oxidation catalysts, aqueous diesel fuel and low sulfur diesel, as defined in SCAQMD Rule 431.2, i.e., diesel with less than 15 ppm sulfur content.
- Install equipment to provide power and air conditioning to the trucks to eliminate the need to run the engine or auxiliary power units.
- Require the use of newer, lower-emitting trucks.
- Require trucks to be properly tuned and maintained.
- Reroute truck route to avoid residential areas or schools.
- Use light-colored roofing materials in construction to deflect heat away from buildings.
- Install automatic lighting on/off controls and energy-efficient lighting.
- Landscape with appropriate drought-tolerant species to reduce water consumption.

5. **CO Hotspots Analysis**: The traffic volumes presented in the CALINE4 output files in Appendix B of the Air Quality Analysis do not appear to match the traffic volumes presented in Tables 13 and 14 of the Traffic Impact Analysis presented in Appendix J of the DEIR. Air quality analyses should be consistent with other analyses (e.g., traffic studies) in the Final EIR.