



South Coast
Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

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Ms. Sarah Rigamat, Planner
Planning Division
City of Los Angeles
200 N. Spring Street, 7th Floor
Los Angeles, CA 90012

Draft Mitigated Negative Declaration (Draft MND) for the Proposed 41st and Alameda Warehouse Project

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 into the Final Mitigated Negative Declaration.

Pursuant to Public Resources Code Section 21092.5, please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final Environmental Impact Report. The SCAQMD staff would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

Steve Smith
Program Supervisor – CEQA Section
Planning, Rule Development & Area Sources

Attachment

SS:GM

LAC080624-01
Control Number

Project Description

1. In Figure I-2 (Aerial Photograph), which shows the proposed project site, the streets are not labeled correctly and the north-south-east-west orientation of the map is incorrect. Other maps, however, and the street configuration used for the HRA are correct. Further, it is recommended that Figure I-2 be shown with an overhead, satellite-type of image, which shows the project site and surrounding land uses, including sensitive receptors.
2. On page 1-3 of the MND, the lead agency states that the 113,256 square feet adjacent to the northeastern corner of the proposed site (northern part of the site with access off East Martin Luther King Jr. Boulevard) will be “gifted” to the City of Los Angeles prior to, or as a condition of, project approval and therefore was not considered part of the proposed project. The SCAQMD recommends that the lead agency specifically prohibit land uses that would include sensitive receptors or industrial land uses that would further expose existing sensitive receptors nearby to additional cancer risks from diesel particulate emissions.

Construction Emissions

3. The LST analysis of construction emissions assumes that a maximum of five acres would be disturbed per day during the grading phase. The lead agency then uses the sample scenario spreadsheet developed by the SCAQMD for five-acre projects (www.aqmd.gov/ceqa/handbook/LST/AppE5_5acre.xls) to calculate construction grading PM emissions. However, the project involves the excavation and export of 57,300 cubic yards of dirt offsite. The “Sample Scenarios for Projects Less than Five Acres in Size” document (www.aqmd.gov/ceqa/handbook/LST/FinalReport.pdf) states on page 1-4 that the sample scenarios should be used for typical construction projects. Further, typical construction projects do not include construction projects with “major excavation and hauling offsite for a project that includes sub-grade levels or parking...” In particular, the equation for soil handling is inappropriate for excavation. A more appropriate equation is the equation in AP-42 for dragline emissions in Chapter 11 (www.epa.gov/ttn/chief/ap42/ch11/final/c11so9.pdf) (see Table 11.9-1 on page 11.9-5). In addition, it is not clear whether or not fugitive PM emissions were calculated for haul trucks hauling soil. Please revise the fugitive dust analysis in the Final MND.
4. On page III-8, the lead agency states that no more than five acres per day would be disturbed during site preparation. The analysis of construction emissions, in particular the LST analysis, limits potential construction emissions based on this assumption. Therefore, the SCAQMD requests that the lead agency formally adopt and include in the Final MND a mitigation measure stating that no more than five-acres per day would be disturbed during site preparation to ensure that construction emissions do not exceed what was calculated in the Draft MND.

5. On page III-11 of the Draft MND, the lead agency has included construction phase mitigation measures including measure 12 – “Heavy-duty equipment shall be equipped with a diesel oxidation catalyst capable of reducing NO_x emissions by 40 percent” to reduce NO_x emissions from construction vehicles and equipment. Review of EPA and CARB verified oxidation technologies shows that the number of verified technologies that can achieve a 40 percent NO_x emission reduction is limited, approximately three technologies. Further, these technologies are only verified for specific engine categories.

It is recommended that the lead agency investigate the availability of diesel oxidation catalyst equipment and demonstrate that they are available for the equipment to be used at the proposed project site. Because the availability of technologies that are verified by the California State Air Resources Board and EPA is relatively limited for off-road construction equipment, they may not be available for use by the project proponent. Until the lead agency can demonstrate the availability of the low emission technologies, the lead agency should not take credit for the 40 percent control efficiency. Alternatively, if the control technologies are not available, the lead agency needs to demonstrate how comparable NO_x emission reductions will be obtained to avoid significant NO_x construction impacts.

Construction Mitigation Measures

6. In addition to the construction mitigation measures listed on Page III-10 of the Draft MND, the SCAQMD recommends the following changes and additions, should the lead agency, after final review (see comments #1 and #2), determine that the short-term (construction) air quality impacts from the proposed project are estimated to exceed established daily significance thresholds for volatile organic compounds (VOC), nitrogen oxide (NO_x), and particulate matter (PM10) to further reduce construction air quality impacts from the project, if applicable and feasible:

The following show recommended changes to the following mitigation measures found on pages III-10 and III-11. Watering has been increased because the dust control efficiency used (61 percent) is for three days watering.

3. Water at least three times daily or a non-toxic stabilizing agent shall be applied according to manufacturers’ specifications to exposed surfaces in sufficient quantity to prevent generation of dust plumes.
9. Operations on unpaved surfaces shall be suspended when exceed 25 miles per hour as instantaneous gusts.
11. On site stockpiles of debris, dirt, or rusty materials shall be covered or watered at least ~~twice~~three times per day.

The following is a list of additional recommended mitigation measures to further reduce VOC, NO_x and fugitive dust:

- Construct/build with materials that do not require painting

- All streets shall be swept at least once a day using SCAQMD Rule 1186 certified street sweepers or roadway washing trucks if visible soil materials are carried to adjacent streets (recommend water sweepers with reclaimed water);
- Require construction equipment that meet or exceed Tier 2 standards and equip construction equipment with oxidation catalysts, particulate traps and demonstrate that these verified/certified technologies are available;
- Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow;
- Reroute construction trucks away from congested streets or sensitive receptor areas;
- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site;
- Improve signal flow by traffic synchronization; and
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation.

Operational Emissions

7. In Appendix G – Traffic Impact Report, the analysis reports a total of 2,581 trips per day generated by the proposed project. The air quality analysis of operational emissions in Appendix E is based on truck surveys at a “similar” distribution facility conducted during one-week in November and two weeks in December. First, there is no indication that the vehicle trips at the “similar” facility are representative of the proposed facility. Second, the number of vehicle trips reported in the surveys show substantially fewer vehicle trips per day than 2,581 trips per day reported in the traffic analysis. If the traffic analysis reports the correct number of vehicle trips, then operational emissions from the proposed project shown in Table III-4 on page III-10 are substantially underestimated. Similarly, the HRA analysis likely underestimates the cancer and noncancer health risks generated by the proposed facility. The lead agency needs to correct or explain this apparent discrepancy.
8. In the Draft MND, the lead agency uses an idling time of ten minutes to estimate health risk for diesel trucks entering and exiting the site. The SCAQMD recommends that the HRA be based on an idling time of 15 minutes, five minutes at entry, five minutes to load/unload, and five minutes upon exiting. Alternatively, the lead agency can continue using the 10 minute idling time if a mitigation measure is included that prohibits idling more than 10 minutes. The mitigation monitoring plan should specify how this mitigation measure would be enforced.

Operation Mitigation Measures

9. Because the California Air Resources Board has classified the particulate portion of diesel exhaust emissions as carcinogenic and the project description potentially includes a substantial increase in the number of heavy-duty diesel truck trips (see

comment #7), the SCAQMD recommends the lead agency consider the following additional mitigation measures to reduce diesel emissions, if feasible:

- Provide minimum buffer zone of 300 meters between truck traffic and sensitive receptors;
- Re-route truck traffic by adding direct freeway off-ramps to the facility or near to the facility;
- Restricting or re-route truck traffic away from sensitive receptors, in particular, restrict or prohibit truck traffic on Long Beach Avenue;
- Improve traffic flow by signal synchronization;
- Enforce truck parking restrictions;
- Develop park and ride programs;
- Prohibit truck idling in excess of five minutes, on- and off-site;
- Restrict operation to “clean” trucks;
- Electrify service equipment facility;
- Provide electrical hook-ups for trucks that need to cool their load, if these are allowed in the future;
- Electrify auxiliary power units;
- Provide onsite services to minimize truck traffic in or near residential areas, including, but not limited to, the following services: meal or cafeteria service, automated teller machines, etc.;
- Require or provide incentives to use particulate traps;
- Conduct air quality monitoring at sensitive receptors;
- Use alternative fueled off-road equipment; and
- Reconfigure the facility to move the primary entry/exit area away from Long Beach Avenue.