



South Coast Air Quality Management District

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Notice of Intent to adopt a Mitigated Negative Declaration (MND) for the Senior Community Housing 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 proposed Mitigated Negative Declaration (MND).

Because the lead agency did not provide a copy of the draft MND during the public comment period, SCAQMD staff received the proposed MND on September 12, 2008, past the close of the public comment period on August 19, 2008. The SCAQMD is the air quality agency for the South Coast Air Basin, which includes the city of Long Beach. In accordance with the intergovernmental review (IGR) responsibilities under CEQA, SCAQMD staff requests that the City send all future CEQA documents where the city is the lead agency to the SCAQMD at the beginning of the comment period for each project to allow the SCAQMD to fulfill its IGR responsibility to review and potentially comment on the air quality analysis prepared by the City. The SCAQMD staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Dan Garcia, Air Quality Specialist – CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,

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

Attachment

SS:DG
LAC0 80930-09
Control Number

Air Quality Analysis -Construction Emissions

1. The Initial Study states that the lead agency estimated construction and operational air quality impacts using the URBEMIS 2002 version 8.7 computer model. The lead agency should be aware that the most current version of the URBEMIS model, URBEMIS2007, was released in September 2007. Because mobile source emission factors are substantially different between URBEMIS 2002 and URBEMIS 2007, SCAQMD staff requests that the lead agency update the air quality analysis using URBEMIS 2007. If the lead agency uses the model for future projects, the SCAQMD recommends that URBEMIS2007 be used. URBEMIS 2007 version 9.2.4 can be accessed at <http://www.urbemis.com/> or the lead agency can follow the calculation methodologies in Chapter 9 and the Appendix to Chapter 9 in the SCAQMD's CEQA Air Quality Handbook.

Once the air quality analysis has been revised the SCAQMD requests that the lead agency revise the Initial Study quantifying peak daily air quality impacts and summarizing all emissions (i.e. NO_x, SO_x, CO, PM₁₀, PM_{2.5} and ROG) from the planned construction and operational activities including; cut-and-fill operations, grading, and on-road and off-road mobile sources. If air quality methodologies other than the URBEMIS 2007 model are used, the Initial Study should also include a description of construction equipment with the corresponding emission factors and methodologies that are used to quantify the peak daily construction and operation air quality impacts from the proposed project.

2. The lead agency provides construction air quality impact results for the proposed project on page 25 and operational air quality impact results on page 26. The URBEMIS 2002 output sheets were not included with the initial study, so SCAQMD staff could not confirm the lead agency's results. SCAQMD staff made a request to the lead agency to provide the URBEMIS 2002 output sheets, but the lead agency was unable to accommodate this request. As already noted, however, the SCAQMD requests that the lead agency revise the air quality analysis by using the most current version of the URBEMIS model, URBEMIS 2007 version 9.2.4.
3. Based on the construction air quality results presented on page 25, the lead agency shows that peak daily construction NO_x emissions exceed the SCAQMD's recommended daily regional NO_x significance threshold. The lead agency then concludes that complying with the requirements of SCAQMD Rule 403 will reduce construction air quality impacts to less than significant. The lead agency should be aware that Rule 403 only regulates fugitive dust and does nothing to reduce NO_x emissions. As a result, the lead agency has not demonstrated that NO_x emissions are less than significant and, therefore, the proposed project may not qualify for an MND unless NO_x mitigation measures are identified that can reduce NO_x emissions to less than the NO_x construction significance threshold.
4. Section VII, Hazards and Hazardous Material and the Location Map provided in Attachment A of the Initial Study for the Proposed MND indicates that the proposed project site is located within one-quarter mile of sensitive receptors (i.e. residential properties and more than one school site). Thus, the SCAQMD requests that the lead agency revise the air quality analysis to evaluate localized air quality impacts and ensure that nearby sensitive receptors are not adversely affected by the construction activities that are occurring in close proximity.

SCAQMD guidance for performing a localized air quality analysis can be found at the following web address: <http://www.aqmd.gov/ceqa/handbook/LST/LST.html> .

In the event that the lead agency's revised regional air quality analysis requested in comment #1 and/or the localized air quality analysis requested in this comment demonstrate that any criteria pollutant emissions exceed the SCAQMD's daily significance thresholds, the SCAQMD recommends that the lead agency consider adding the following mitigation measures to further reduce air quality impacts from the construction phase of the project, if feasible:

NOx:

- Prohibit vehicle and engine idling in excess of five minutes and ensure that all off-road equipment is compliant with the California Air Resources Board's (CARB) in-use off-road diesel vehicle regulation and SCAQMD Rule 2449,
- Require construction equipment to meet or exceed Tier 3 standards with available CARB verified or certified technologies,
- Require the use of alternative fueled off-road construction equipment,
- Require the use electricity from power poles rather than temporary diesel or gasoline power generators,
- Require construction parking to be configured such that traffic interference is minimized,
- Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow,
- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site,
- Schedule construction activities that affect traffic flow on the arterial system to off-peak hours to the extent practicable,
- Reroute construction trucks away from congested streets or sensitive receptor areas,
- Improve traffic flow by signal synchronization, and
- Ensure that all vehicles and equipment will be properly tuned and maintained according to manufacturers' specifications.

For additional measures to reduce off-road construction equipment, refer to the mitigation measure tables located at the following website:

www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html.

Fugitive Dust:

- Require the application of non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more),
- Install wheel washers where vehicles enter and exit the construction site onto paved roads or wash off trucks and any equipment leaving the site,
- Require all trucks hauling dirt, sand, soil, or other loose materials to be covered,
- Suspend all excavating and grading operations when wind gusts (as instantaneous gusts) exceed 25 mph,

- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation,
- When sweeping streets to remove visible soil materials use SCAQMD Rule 1186 and 1186.1 certified street sweepers or roadway washing trucks, and
- Replace ground cover in disturbed areas as quickly as possible.

VOC

- Use coatings and solvents with a VOC content lower than that required under SCAQMD Rule 1113,
- Construct or build with materials that do not require painting, and
- Require the use of pre-painted construction materials.

5. The lead agency identifies the SCAQMD Rule 403 – Fugitive Dust as a mitigation measure to address fugitive dust emissions from the proposed construction activities summarized in the project description, however, compliance with SCAQMD Rule 403 is required and should be clearly distinguished from measures that are intended to mitigate fugitive dust emissions beyond compliance with this regulation.

The mitigation measures for fugitive dust emissions should be specific and quantifiable. Also, SCAQMD staff recommends the following revisions to the proposed mitigation measures under II-1:

- Require the application of non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (i.e. previously graded areas inactive for ten days or more).
6. Given the position of the legislature on AB32, which states that global warming poses serious threats to the environment, and the position of the California Attorney General's office on global climate change, it is incumbent on the lead agency to analyze greenhouse gas (GHG) emissions from proposed projects and determine whether the proposed project will have a significant GHG impact. By not making a significance determination, the lead agency may be violating a fundamental requirement of CEQA to mitigation potentially significant adverse impacts.