



South Coast
Air Quality Management District

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

FAXED: April 3, 2009

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Mr. Gene Directo
Senior Construction Manager, Bond Management Team,
LBCCD
4901 E. Carson Street – G21
Long Beach, CA 90808

Dear Mr. Directo:

**Response to Response to Comments on the Draft Mitigated Negative Declaration
for the Long Beach Community College Parking Structure J Project**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the response to comments on the Draft Mitigated Negative Declaration for the Long Beach Community College Parking Structure J Project

The attached comments are meant as guidance for the Lead Agency and should be incorporated into the Final Mitigated Negative Declaration (MND). Please provide the SCAQMD 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 these issues and any other questions that may arise. Please contact me at (909) 396-3105 or James Koizumi at (909) 396-3234 if you have any questions regarding these comments.

Sincerely,

Susan Nakamura
Planning & Rules Manager

Attachment

SN:JK

LAC090327-01
Control Number

Attachment A
Response to Response to Comments on the
Draft Mitigated Negative Declaration for the
Long Beach Community College Parking Structure Project

1. Response to Response to Comments 1

The AQMD staff appreciates that the lead agency summarized the air quality analysis from the Program EIR as requested. The response states that the construction was assumed not to overlap in the Program EIR. However, it is not clear from the discussion if the construction of Parking Structure J was specifically included in the Program EIR and if the construction schedule in the MND would prevent overlap of construction. A discussion should be included that states how the construction emissions estimated in the MND relate to the emissions estimated in the Program EIR (i.e., are the emissions estimated in the MND greater than those estimated in the Program EIR. If so the emissions estimates are different, how does this effect the conclusions in the Program EIR). A mitigation measure should be added to the Final MND that states that construction of Parking Structure J would not overlap with any other construction projects at Long Beach Community College.

Adverse operational air quality impacts from the Program EIR are presented in the response to comment. It is not clear from the response if traffic associated with Parking Structure J was specifically included in the Program EIR. A discussion should be included that states how the operational emissions estimated in the MND relate to the emissions estimated in the Program EIR (i.e., are the emissions estimated in the MND greater than those estimated in the Program EIR. If so the emissions estimates are different, how does this effect the conclusions in the Program EIR).

2. **Response to Response to Comments 2**

The Response to Comment #2 is confusing. The text appears to address operational emissions; however, emissions in Table 1 are the same as those in the spreadsheet in Attachment 2 Titled 20025 – LBCC Parking Structure J LST Analysis. However the activities in the spreadsheet in Attachment 2 Titled 20025 – LBCC Parking Structure J LST Analysis are construction activities (e.g., Construction/Asphalt/Painting, Site Preparation/Rough Grading, and Rough Grading). The source treatment (i.e., release heights and PM10 fugitive dust equation) are consistent for guidance on construction LST.

There are several inconsistencies in the construction LST analysis that may impact the significance determination. The source area in the spreadsheet in Attachment 2 Titled 20025 – LBCC Parking Structure J LST Analysis is 19,426 square meters (139 meters x 139 meters); however, the area used in the air dispersion model is 15,411 square meters (124 meters x 124 meters). The construction activity was modeled as an area source. The emission rate for area sources has the units meters per second per area. Therefore, emissions released over a smaller area typically results in an increase in concentration. Since the emissions rate was developed with an emissions rate based on 19,426 square meters, but release over an area of 15,411 square meters, the resulting concentrations are not meaningful.

In addition, the PM10 emissions were estimated by scaling the emissions at the edge of the disturbed area to the distance from the source to the receptor using an equation developed by Desert Research Institute. SCAQMD staff can reproduce values for source/receptor distances from 50 meters to 1,000 meters. SCAQMD staff could not reproduce the concentration at the 40 meter source/receptor distance, which is distance to the nearest sensitive receptor presented in the response to comments. At 40 meters, the concentration in the response to comments is listed as 10.36 micrograms per cubic meter. Using the concentration at the fence line of 71.57 micrograms per cubic meter and the 40 meter distance, it appears that the concentration should be 10.60 micrograms per cubic meter ($0.9403 \times 71.57 \text{ ug/m}^3 \times e^{-0.0462 \times 40 \text{ m}} = 10.60 \text{ ug/m}^3$), which is greater than the significance threshold of 10.4 micrograms per cubic meter.

Since the area disturbed appears to be less than five acres, SCAQMD staff suggests that the lead agency compare the construction phase from the proposed project to the sample construction scenarios listed on the SCAQMD LST webpage at <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>. The construction emissions from the sample construction project are below the mass-rate LSTs for any source receptor area (SRA) in the district. If the equipment and activities from the proposed project phases are similar to the construction equipment and activities in corresponding sample construction scenario, then that sample construction scenario can be used as a surrogate to represent the proposed project.

If the construction equipment and activities are greater than those presented in the sample construction scenarios, then air dispersion modeling should be done.

It appears that the operational LST analysis was not included in the response to comments. SCAQMD staff requests that the lead agency provide the operational LST analysis.

3. Response to Response to Comments 2

Not all of the GHG calculations are provided in the Attachments to the response to comments. Emissions from electric use, potable water treatment and wastewater treatment were not included. Please include these calculations in the Final Program EIR.