



South Coast Air Quality Management District

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E-MAILED: February 20, 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:

**Draft Mitigated Negative Declaration
for the Long Beach Community College Project**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document.

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) 396-3054 or James Koizumi at (909) 396-3234 if you have any questions regarding these comments.

Sincerely,

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

Attachment

SS:JK

LAC090122-03
Control Number

Attachment A
Draft Mitigated Negative Declaration
for the Long Beach Community College Project

1. General Comment

On page 1-1 of the Draft MND the lead agency states that a program environmental impact report (PEIR) was prepared for the LAC Master Plan. Further, the PEIR included an analysis of a four-story, 175,000 square foot parking structure located at the southeast corner of Clark Avenue and Lew Davis Street. Although not stated it appears that the MND for the currently proposed project tiers off of the previously prepared PEIR pursuant to CEQA Guidelines §15152. If this is the case, SCAQMD staff request that the lead agency provide summaries of the results of the air quality analysis for both construction and operation impacts pursuant to CEQA Guidelines §15150 so SCAQMD staff can evaluate whether or not overlapping construction and or operation emissions were sufficiently analyzed. If not, such an analysis should have been included in the Draft MND.

2. Localized Operational Air Quality Impacts

On page 3-9 there is a statement that the proposed project would not generate any traffic; therefore, traffic emissions are not included. Unless an equivalent number of parking spaces is removed from the campus, it is unclear from the document how this statement is true. New trips may be generated by growth at the college or by current students or faculty that might not have driven because not enough parking was available at the existing site. On page 1-1, for example, the lead agency states, “The District is undertaking an extensive improvement and building program at the two campuses to meet increasing enrollment needs...” Parking structures are typically built to accommodate growth and/or replace existing parking that is being removed. Further, some students who park in the southern parking lots and students who park in the neighborhood north of LBCCD LAC would park in the proposed parking lot, there may be adverse localized operational air quality impacts.

Even if the assumption that there will be no increase in the number of vehicle trips is correct, there will be an increase in the number of vehicles driving to, and queuing in the parking structure. Although a CO hotspots analysis was prepared for intersections near the parking structure to address localized air quality impacts; no similar analysis was done for vehicle exhaust emissions while in the parking structure. A localized air quality analysis should also address other criteria pollutants, such as, NO_x, PM₁₀ or PM_{2.5}.

It is recommended that lead agency estimate criteria pollutant emissions from the proposed parking lot, and compare them to values in the operational LST mass-rate look-up tables to demonstrate that the adverse localized operational air quality impacts would not be significant.

3. Greenhouse Gas Emissions

Greenhouse gas (GHG) emission impacts were not analyzed in the Draft MND. An analysis of GHG from the proposed project should be included in the Final MND. If GHG emission impacts from the proposed parking structure were addressed in the 2004 Master Plan PEIR, then a summary of the analysis should be included in the Final MND.