



South Coast Air Quality Management District

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E-Mailed: March 28, 2013
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Review of the Draft Mitigated Negative Declaration (Draft MND) for the Proposed Drake Park Soccer Field Project

The South Coast Air Quality Management District (AQMD) 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 environmental document as appropriate.

The proposed project is considered a sensitive land use¹; as a result, the AQMD staff is concerned about its close proximity (less than 100 feet) to an active industrial area located along the northern boundary of the project site. Based on Figure 2.3 of the Draft MND it appears that the aforementioned industrial area contains diesel truck activity for logistics operations, however, the lead agency does not provide any information pertaining to the level or type of diesel truck activity in this area. Therefore, AQMD staff requests that the lead agency provide additional information about the level of diesel truck activity in the surrounding industrial area (e.g., approximate daily truck volumes, truck classifications and hours of operation). In the event that the lead agency determines that the surrounding industrial uses accommodate more than a 100 trucks per day, more than 40 trucks per day with transport refrigeration units (TRUs) or TRU operations that exceed 300 hours per week (consistent with Table 1-1 of the Air Quality and Land Use Handbook) the AQMD staff recommends that the lead agency conduct a Health Risk Assessment (HRA) to determine the potential health risk impacts from surrounding industrial activities prior to approval of the Final MND. Also, if the lead agency determines that the project will have any significant health impacts the AQMD staff recommends that pursuant to Section 15370 of the California Environmental Quality Act

¹ California Air Resources Board. April 2005. "Air Quality and Land Use Handbook: A Community Health Perspective." Accessed at: <http://www.arb.ca.gov/ch/landuse.htm>

(CEQA) Guidelines additional mitigation measures are considered to minimize such impacts.

The AQMD staff requests that the lead agency provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. Further, 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,



Ian MacMillan
Program Supervisor, CEQA Inter-Governmental Review
Planning, Rule Development & Area Sources

IM:DG

LAC130228-03
Control Number