



South Coast Air Quality Management District

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Port of Long Beach
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**Revised Draft Environmental Impact Report / Environmental Assessment and
Application Summary Report (EIR/EA) for the Port of Long Beach
Gerald Desmond Bridge Replacement Project**

South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document, including with an extended review period. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final EIR/EA.

SCAQMD staff commends the Lead Agency for providing a quantitative air quality analysis of this transportation project. This quantification and comparison with established thresholds provides the public and decision makers with the relevant information needed to determine potentially significant impacts from the project.

SCAQMD staff requests clarification regarding how air quality may be impacted by vessel traffic that is rerouted due to the new bridge height. If additional vessel emissions will occur beneath the bridge due to additional traffic or increased vessel size, these potential air quality impacts should be addressed in the Final EIR/EA. Also, if construction related traffic impacts (i.e., partial temporary closure of rail lines and roads) have the potential to increase or significantly reroute truck traffic, then quantification and analysis of these emissions may be required.

As you are aware, it is important that the ports continue to maximize on-dock rail to minimize drayage of cargo to near and off-dock rail yards. The SCAQMD staff is concerned that the placement of footings immediately adjacent to existing rail lines may impact future on-dock rail expansion projects. The SCAQMD staff requests additional information to clarify that the design of the proposed project will not impede future on-dock rail projects. More detailed comments are included in the attachment.

Mr. Richard Cameron
Director, Environmental Planning

April 2, 2010

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD staff with written responses to all comments contained herein prior to the adoption of the Final EIR/EA. The SCAQMD staff would be happy to work with the Lead Agency to address these issues and any other questions that may arise. If you have any questions regarding these comments, please contact Ian MacMillan at (909) 396-3244.

Sincerely,



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

Attachment

SN:IM
LAC100205-01
Control Number

OPERATION

1. Vessel emissions

Emissions associated with rerouted vessel movement facilitated by this project have not been quantified in the Draft EIR/EA. As stated in Section 1.1.2.2 of the Draft EIR/EA, the current bridge does not provide enough clearance for passage of some existing container ships. A new, higher bridge would allow the passage of larger ships with higher emissions. Although this project does not necessarily increase the capacity of port berths (as stated in Section 2.1.2.3 of the Draft EIR/EA), the proposed project enables ship traffic to be rerouted through the channel beneath the higher bridge. Potential emission impacts associated with this rerouted ship traffic should be quantified in the Final EIR/EA.

2. Design constraints

It appears that some footings and abutments will be placed in close proximity to existing rail lines. SCAQMD staff requests clarification regarding the placement of these structures and whether they will restrict or modify projects that plan to increase on-dock rail. Restriction of future on-dock rail could indirectly require an increase in truck traffic (and associated emissions) between the ports and off-dock areas, such as rail yards. If the proposed project limits future planned expansion of on-dock rail, air quality impacts associated with potential increased truck emissions should be addressed prior to certification of the Final EIR/EA.

3. Criteria pollutants

The trend analysis of particulate matter impacts is unclear. Port specific data may provide a more revealing and useful analysis of particulate matter trends near the project location. For example, Table 2.2.5-17 only presents data from the North Long Beach monitoring station, and neglects data from stations closer to the project such as the monitoring station on East Pacific Coast Highway (Station ID 70110) and port stations. These stations show significant variations in data, especially for PM10. Lastly, Table 2.2.5-17, Table 2.2.5-18, and Exhibit 2.2.5-3 do not present a comparison of ambient air quality levels with more stringent state air quality standards. These background data should be reviewed and updated in the Final EIR/EA.

4. Model parameters

SCAQMD staff noted the following discrepancies between the description of model parameters in the text of the Draft EIR/EA and the electronic model files. An explanation or a revised analysis should be presented in the Final EIR/EA.

- Release heights described on page 77 of the Revised Air Quality Technical Study (AQTS) do not appear to match the model inputs.
- As stated in Appendix D of the AQTS (pg. D-13), acute health effects from diesel exhaust were calculated using speciation factors from CARB. Calculations using these speciated emissions are not clear in the appendix, nor is it clear if these emissions were carried through into the modeling.
- Source names identified in Table D-2 of Appendix D of the AQTS do not match the source names in the model files. Hence it is difficult to track emission rates from the AQTS through the modeling.

CONSTRUCTION

1. Construction related traffic impacts

It appears that the Draft EIR/EA has not assessed potential localized increases in emissions during construction due to traffic impacts such as rerouting or delays. Given the large percentage of heavy duty diesel vehicles that travel within the project boundary, any potential disruption of traffic flow (e.g., detours, shut down of lanes) may shift this diesel traffic into adjacent areas. As an example, it is unclear if reconfiguration of the rail line north of Ocean Boulevard on Pier S (as indicated on pg. 1-24 of the Draft EIR/EA) will result in temporary increased truck traffic due to shut down of this rail line. Potential air quality impacts due to construction related traffic impacts should be discussed in the Final EIR/EA.

2. NOx impacts

The screening level LST analysis presented in Table 2.2.5-7 indicates that a significant impact may occur during years 2 and 3 of construction. Given the irregular project boundary shape, and associated construction activity, more refined modeling may provide insights into why this impact is significant. This more refined analysis may reveal potential opportunities for additional mitigation measures that could reduce this impact to a less than significant level (such as reducing certain construction activity, like stationary diesel generators, close to sensitive receptors).

3. Construction equipment emission rates

SCAQMD staff is concerned that several mitigation measures (MM) are not accounted for in the emission calculations. If mitigation is feasible, then the emission calculations should reflect their implementation. If implementation is unclear, then a comparison of the effects with and without mitigation should be presented. For example:

- In the construction equipment emission calculations, it appears that mitigation measures will only reduce exhaust emissions by 5%. However, mitigation measure (MM) AQ-C9 states that “*Where feasible, construction equipment shall meet the EPA Tier 4 non-road engine standards.*” The reductions from using Tier 4 equipment would be much greater than 5%.
- MM AQ-C8 states that “*Trucks used for construction prior to 2015 shall use engines with the lowest certified NOx emission levels, but not greater than the 2007 NOx emission standards.*” This reduction also does not appear to be accounted for in the emission calculations.
- MM AQ-C4 states that “*To the extent feasible, use electricity from power poles rather than temporary diesel or gasoline power generators.*” The emission calculations do not reflect any reduced use of diesel generators.

Emission calculations in the Final EIR/EA should also include the effects of using Tier 4 non-road equipment and 2007 and newer trucks for construction activities.

4. Criteria pollutants

SCAQMD staff noted several discrepancies related to criteria pollutants. They include:

- The historical criteria pollutants reported in Tables 2.2.5-4 should be reviewed and updated as the data there may be underreported. In particular, PM_{2.5} levels may have typographical errors when compared to SCAQMD tables available here: <http://www.aqmd.gov/smog/historicaldata.htm>.
- Table 2.2.5-5 should be updated to include the highest values from the last three years of data, if available.
- The SCAQMD LST thresholds presented in Table 2.2.5-7 appear to be incorrectly reported for the cited 483 meter source-receptor distance. These values should be reviewed and updated as necessary.