



South Coast
Air Quality Management District

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E-Mailed: April 6, 2011
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Mr. Steve Gerhardt
City of Long Beach
Department of Development Services
333 W. Ocean Blvd, 5th Floor
Long Beach, CA 90802

**Review of the Draft Environmental Impact Report (Draft EIR)
for the Proposed Downtown Plan 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 Impact Report (final EIR) as appropriate.

The AQMD staff is concerned about the significant construction-related air quality impacts from the proposed project. Therefore, the lead agency should incorporate additional mitigation measures to reduce these significant impacts pursuant to Section 15126.4 of the California Environmental Quality Act (CEQA) Guidelines. Further, AQMD staff recommends that the lead agency include feasibility standards in the final EIR that are applicable to the project's operational mitigation measures to ensure that the operational air quality impacts from the project are minimized. Details regarding these comments are attached to this letter.

Pursuant to Public Resources Code Section 21092.5, 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 EIR. 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,

A handwritten signature in black ink, appearing to read "Ian V. MacMillan". The signature is written in a cursive, slightly slanted style.

Ian MacMillan

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

Attachment

SN:IM:DG

LAC101209-03
Control Number

Mitigation Measures for Construction Air Quality Impacts

1. Given that the lead agency concluded that the proposed project will have significant construction related air quality impacts from VOC, NOX, PM10 and PM2.5 criteria pollutant emissions the AQMD staff recommends that the lead agency provide additional mitigation pursuant to CEQA Guidelines §15126.4. Specifically, AQMD staff recommends that the lead agency minimize or eliminate significant adverse air quality impacts by adding the mitigation measures provided below.
 - 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,
 - Reroute construction trucks away from congested streets or sensitive receptor areas,
 - Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation,
 - Improve traffic flow by signal synchronization, and ensure that all vehicles and equipment will be properly tuned and maintained according to manufacturers' specifications,
 - Use coatings and solvents with a VOC content lower than that required under AQMD Rule 1113,
 - Construct or build with materials that do not require painting,
 - Require the use of pre-painted construction materials,
 - Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export),
 - During project construction, all internal combustion engines/construction equipment operating on the project site shall meet EPA-Certified Tier 2 emissions standards, or higher according to the following:
 - ✓ Project Start, to December 31, 2011: All offroad diesel-powered construction equipment greater than 50 hp shall meet Tier 2 offroad emissions standards. In addition, all construction equipment shall be outfitted with the BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 2 or Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
 - ✓ January 1, 2012, to December 31, 2014: All offroad diesel-powered construction equipment greater than 50 hp shall meet Tier 3 offroad emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

- ✓ Post-January 1, 2015: All offroad diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
- ✓ A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.
- ✓ Encourage construction contractors to apply for AQMD "SOON" funds. Incentives could be provided for those construction contractors who apply for AQMD "SOON" funds. The "SOON" program provides funds to accelerate clean up of off-road diesel vehicles, such as heavy duty construction equipment. More information on this program can be found at the following website: <http://www.aqmd.gov/tao/Implementation/SOONProgram.htm>

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.

Mitigation Measures for Operational Air Quality Impacts

3. The lead agency's air quality analysis demonstrates significant air quality impacts from all criteria pollutant emissions including NO_x, SO_x, CO, VOC, PM₁₀ and PM_{2.5} emissions. As a result, the lead agency includes Mitigation Measure AQ-2 to minimize the project's operational air quality impacts. However, the AQMD staff is concerned about the effectiveness of Mitigation Measure AQ-2 given that the implementation of this measure is contingent on a feasibility demonstration by the project applicant. Therefore, the lead agency should ensure that the project's air quality impacts are minimized by incorporating feasibility standards in the final EIR similar to those required for the project's greenhouse gas mitigation measures in section 4.5 (pages 4.5-24 and 4.5-25) of the draft EIR.