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Draft Supplemental Environmental Impact Report (DSEIR) for the Proposed 2041 Facilities Master Plan Liberal Arts Campus Improvements Project

The South Coast Air Quality Management District (SCAQMD) staff 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 CEQA document.

SCAQMD Staff's Summary of Project Description

The lead agency proposes to update the Long Beach Community College District Facilities Master Plan. Updates to the plan will result in an estimated 109,156 square feet of demolition, 387,341 square feet of renovations and 264,018 square feet of new construction on 29.84 acres (proposed project). The project is located at 4901 East Carson Street on the northwest corner of East Carson Street and Clark Avenue in the City of Long Beach.

SCAQMD Staff's Summary of Air Quality Analysis

The lead agency determined the proposed project would have less than significant impacts to regional and localized air quality during construction and operation.[1] However, the lead agency did not adequately analyze the proposed project's air quality impacts from construction and operation. Please see SCAQMD staff's detailed comments below.

SCAQMD Staff's Comments

Overlapping Construction and Operation

The proposed project is expected to be built-out over the next 20 years according to Table ES-2: 2041 Facilities Master Plan Construction by Planned Construction Years.[2] Since the implementation of the proposed project is expected to take place over an extended period of time, an overlapping construction and operation scenario is reasonably foreseeable. However, the lead agency did not analyze a scenario where construction activities overlap with operational activities. Therefore, to analyze the worst-case impact scenario, SCAQMD staff recommends that the lead agency identify the overlapping years, combine construction emissions (including emissions from demolition) with operational emissions, and compare the combined emissions to SCAQMD's air quality CEQA operational thresholds of significance to determine the level of significance in the final CEQA document.

Interim Milestone Years - Operation

The lead agency used the full build-out year of 2041 for their operational analysis; however, the proposed project will be operational prior to year 2041. Although year 2041 assumes that the project is at its peak operational capacity, utilizing a single future operational year for emissions analysis improperly credits

[1] DSEIR, Air Quality and Greenhouse Gases Assumptions, Pages 13-14.
[2] DSEIR, Executive Summary, page 6.

the project's operational emissions with reductions that are expected to occur independent of the proposed project. Specifically, the overall emission rates of vehicles, trucks, and equipment are generally higher in earlier years as more stringent emissions standards and cleaner technologies have not been fully implemented and fleets have not been fully turned over. Therefore, SCAQMD staff recommends that the lead agency incorporate interim milestone years (i.e., year 2020, 2025, 2030, 2035, and 2040) into the air quality analysis to properly disclose the proposed project's peak daily operational emissions during the entirety of operation.

Mitigation Measures

In the event that, after revising the air quality analysis, the lead agency determines that the proposed project will have significant impacts to air quality, mitigation measures will be required. The following mitigation measures are meant as guidance for the lead agency and should be considered for incorporation into the final CEQA document:

Construction Mitigation Measures

- Require all off-road diesel-powered construction equipment meet or exceed Tier 4 off-road emissions standards. A copy of the fleet's tier compliance documentation, and CARB or SCAQMD operating permit shall be provided to the Lead Agency at the time of mobilization of each applicable unit of equipment. In the event that all construction equipment cannot meet the Tier 4 engine certification, the Lead Agency must demonstrate through future study with written findings supported by substantial evidence before using other technologies/strategies. Alternative strategies may include, but would not be limited to, reduction in the number and/or horsepower rating of construction equipment, limiting the number of daily construction haul truck trips to and from the Proposed Project, and/or limiting the number of individual construction project phases occurring simultaneously. Include this requirement as a bid or contract specification with contractors. Require periodic reporting and provision of written documents by contractors to prove and ensure compliance.
- Require all diesel-fueled trucks including, but not limited to, construction hauling trucks and/or material delivery trucks, accessing the proposed project meet the U.S. Environmental Protection Agency (EPA)/California Air Resource Board (CARB) truck engine standard for Model Year 2010 or better. Additionally, consider other measures such as incentives, phase-in schedules for clean trucks, etc.
- Implement performance standards-based technology review during the development phase of the proposed project. Since the proposed project will be built over a 20-year period, and as technology continues to advance, the lead agency should take this opportunity to develop a pathway to deploy lowest emission technologies possible in the development life of the proposed project. To facilitate this requirement, SCAQMD staff recommends that the lead agency develop a plan to assess equipment availability, equipment fleet mixtures, and best available emissions control devices periodically after the proposed project is approved, and specify performance standards for the technology assessment. A performance standards-based technology review is generally feasible at a programmatic level for an area-wide and long-range plan such as the proposed project.

Operational Mitigation Measures

Transportation and Parking

- Provide incentives for employees in order to encourage the use of public transportation or carpooling, such as discounted transit passes or carpool rebates.
- Implement a rideshare program for employees and set a goal to achieve a certain participation rate over a period of time.

- Provide a parking system that allows for quick entry and exit in order to reduce vehicle idling time. A system should also be installed that provides sufficient signage or communication for available parking. A real time information system on parking availability in the parking lot can minimize the amount of time it takes to find available parking.

Other Mitigation Measures

- Require the use of electric landscaping equipment, such as lawn mowers and leaf blowers.
- Require the use of electric or alternatively fueled sweepers with HEPA filters.
- Maximize the planting of tress in landscaping and parking lots.
- Use of water-based or low VOC cleaning products.

Response to Comments

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), SCAQMD staff requests that the lead agency provide SCAQMD staff with written responses to all comments contained herein prior to the certification of the final supplemental EIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful or useful to decision makers and to the public who are interested in the proposed project. Further, when the lead agency makes the finding that the recommended mitigation measures are not feasible, the lead agency should describe the specific reasons for rejecting them in the final supplemental EIR (CEQA Guidelines Section 15091).

SCAQMD staff is available to work with the lead agency to address any air quality questions that may arise from this comment letter. Please contact Alina Mullins, Assistant Air Quality Specialist, at amullins@aqmd.gov or (909) 396-2402, should you have any questions.

Sincerely,

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