



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Port of Long Beach – Environmental Planning
4801 Airport Plaza Drive
Long Beach, California 90815

Mitigated Negative Declaration (MND) for the Proposed Toyota Logistics Services Improvement Project

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comment is meant as guidance for the Lead Agency and should be incorporated into the Final MND.

SCAQMD Staff's Summary of the Project Description

The Lead Agency proposes to demolish 223,200 square feet of existing process facilities, and construct 180,972 square feet of facilities including a 7,462-square-foot fuel island with 13 gasoline pumps and a 13,600-square-foot hydrogen fuel cell power plant on 130 acres (Proposed Project). “The existing Toyota Logistics Services [TLS] fuel storage and dispensing facility would be relocated within the project site and would continue to operate under a SCAQMD permit with 13 gas pumps equipped with Phase II vapor recovery and four above ground storage tanks equipped with vapor recovery¹.” Construction is expected to take approximately 18 months².

SCAQMD Staff's Comments – Permits and Compliance with SCAQMD Rules

Since the Proposed Project involves relocation of the existing fueling activities, modification to an existing SCAQMD permit may be required. If there are permitting questions concerning the gasoline service station, they can be directed to SCAQMD Engineering and Permitting staff at (909) 396-2551. The Final MND should include a discussion to demonstrate that the Proposed Project will continue to be compliant with SCAQMD Rules, including, but are not limited to, Rule 201 – Permit to Construct, Rule 203 – Permit to Operate, and Rule 461 – Gasoline Transfer and Dispensing. Additionally, the Proposed Project includes a hydrogen fuel cell power plant. In the event that a permit from the SCAQMD is required, the SCAQMD should be identified as a Responsible Agency for the Proposed Project in the Final MND. Please note that any assumptions used in the air quality analysis in the Final MND will be the basis for permit conditions and limits.

Closing

Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process. Please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final MND. When responding to issues raised in the comments, response should provide sufficient details 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 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.

¹ MND. Page 2-18.

² MND. Page 2-22.

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 me at lsun@aqmd.gov or Daniel Garcia, Program Supervisor, at dgarcia@aqmd.gov if you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS

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