



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

February 20, 2020

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Draft Environmental Impact Report (Draft EIR) for the Proposed Spring Street Business Park Project (SCH No. 2019100514)

South Coast Air Quality Management District (South Coast AQMD) 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 EIR.

South Coast AQMD Staff's Summary of Project Description

The Lead Agency proposes to construct 160,673 square feet of non-refrigerated¹ warehouses on 7.8 acres (Proposed Project). The Proposed Project is located on the southwest corner of Spring Street and Orange Avenue in the City of Long Beach. Construction of the Proposed Project is anticipated to occur over nine months². Once operational, the Proposed Project will have 18 loading docks³ and involve 126 daily truck trips⁴. Based on reviews of Figure 2-1: *Regional Vicinity and Project Location* in the Draft EIR and aerial photographs, South Coast AQMD staff found that the Proposed Project is surrounded by recreational, commercial, and industrial uses⁵.

South Coast AQMD Staff's Comments

The Proposed Project involves operation of warehouse uses, which are expected to cause 126 truck trips per day. Diesel particulate matter (DPM) will be emitted from the transportation and idling of trucks visiting the Proposed Project. DPM has been identified by the California Air Resources Board (CARB) as a toxic air contaminant based on its carcinogenic effects⁶. However, based on reviews of the Draft EIR and supporting technical documents, South Coast AQMD staff found that the Lead Agency did not perform a mobile source health risk assessment (HRA) analysis in the Draft EIR. One of the basic purposes of CEQA is to inform decision-makers and the public about the potential, significant environmental effects of proposed activities (CEQA Guidelines Section 15002(a)(1)). The decision as to whether a project may have one or more significant effects shall be based on substantial evidence in the record of the lead agency (CEQA Guidelines Section 15064(f)). Therefore, South Coast AQMD staff recommends that the Lead Agency perform a mobile source HRA analysis⁷ in the Final EIR and compare cancer risk to South Coast AQMD's CEQA significance threshold of 10 in one million for cancer risk to determine the level of significance for the Proposed Project's health risk impacts. This analysis serves as substantial evidence to support the Lead Agency's finding that operation of the Proposed Project will not result in significant health risk impacts.

¹ Draft EIR. Page. 2-4.

² *Ibid.* Page 2-10.

³ *Ibid.* Page 1-1.

⁴ *Ibid.* Appendix E. Page 18

⁵ *Ibid.* Page 2-2.

⁶ CARB. August 27, 1998. Resolution 98-35. Accessed at: <http://www.arb.ca.gov/regact/diesltac/diesltac.htm>.

⁷ South Coast AQMD. *Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.

Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), South Coast AQMD staff requests that the Lead Agency provide South Coast AQMD staff with written responses to all comments contained herein prior to the certification of the Final 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, informative, or useful to decision makers and to the public who are interested in the Proposed Project.

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please feel free to call me at (909) 396-3308 if you have questions or wish to discuss the comments.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

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LAC200220-03

Control Number