



South Coast Air Quality Management District

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E-Mailed: July 6, 2012
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Mr. Christopher Cannon
Director of Environmental Management
Los Angeles Harbor Department
P.O. Box 151
San Pedro, CA 90733-0151

Review of the Draft Environmental Impact Report (Draft EIR) for the City Dock No. 1 Marine Research Center Project

The South Coast Air Quality Management District (AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comment is intended to provide guidance to the lead agency and should be incorporated into the Final Environmental Impact Report (Final EIR) as appropriate.

Based on a review of the Draft EIR the proposed project would have significant regional air quality and greenhouse gas (GHG) emissions impacts. Specifically, the proposed project would exceed the AQMD's regional construction and operational emissions thresholds for NO_x, VOCs and CO emissions and would yield over 28,000 MTCO₂e/year. Therefore, to minimize the project's significant air quality impacts from the proposed project the AQMD staff recommends that the lead agency provide additional mitigation measures pursuant to CEQA Guidelines Section 15126.4. Further, the AQMD staff recommends that the lead agency revise mitigation measure (MM) AQ-1 to ensure the project's insignificant localized construction impacts. Details regarding these comments are attached to this letter.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD 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 that reads "Ian V. MacMillan". The signature is written in a cursive style with a large initial "I" and "M".

Ian MacMillan

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

Attachment

IM:DG

LAC120529-05
Control Number

Construction Equipment Mitigation Measures

1. The proposed project exceeds the CEQA localized construction significance thresholds for NO_x in the years 2014 and 2015; therefore, the lead agency determined that the project could contribute to exceedances of the federal ambient air quality standard for NO₂ in the immediate project vicinity. As a result, the lead agency requires mitigation measures MM AQ-1 through AQ-7 to reduce these potential impacts to an insignificant level. However, the AQMD staff is concerned that these measures may not provide enforceable emission reductions that are necessary to reduce the project's impacts to an insignificant level. Specifically, the AQMD staff is concerned that the exemptions provided for MM AQ-1 may reduce the effectiveness of the measure resulting in higher emissions than estimated. Therefore, the Final EIR should include a revision to MM AQ-1 that removes the conditions/exemptions provided below the actual mitigation measure or revise the air quality analysis such that it does not take credit for the emissions benefits provided by MM AQ-1. While these conditions may be reasonable tests to determine feasibility, the uncertainty about the availability of the mitigation measure as currently stated in the Draft EIR precludes the lead agency's ability to enforce actual mitigation during project activities.

Operational/Greenhouse Gas Mitigation Measures

2. Given that the lead agency determined that the proposed project will exceed the CEQA regional operational significance thresholds for NO_x, VOC, CO, and GHG's, the AQMD staff recommends that the lead agency provide the following additional mitigation measures pursuant to CEQA Guidelines Section 15126.4.

Transportation

- Require electric car charging stations and provide designated areas for parking of zero emission vehicles (ZEVs) for car-sharing programs.
- Provide incentives for employees and the public to use public transportation such as discounted transit passes, and/or other incentives.
- Implement a rideshare program for employees.
- Create or participate in local "light vehicle" networks, such as neighborhood electric vehicle (NEV) systems.
- Require the use of electric or alternative fueled maintenance vehicles.
- Provide parking system for quick entry and exit that will reduce vehicle idling time. A system should also be installed that provides sufficient signage or communication for available parking, parking locations, and parking fee.
- Construct off-site bicycle facility improvements, such as bicycle trails linking the facility to designated bicycle commuting routes or on-site improvements such as bicycle paths, bicycle parking facilities, etc.

Energy

- Maximize use of solar energy including solar panels; installing the maximum possible number of solar energy arrays on the building roofs and/or on the Project

- site to generate solar energy for the facility.
- Require all lighting fixtures, including signage, to be state-of-the art and energy efficient, and require that new traffic signals have light-emitting diode (LED) bulbs and require that light fixtures be energy efficient compact fluorescent and/or LED light bulbs. Where feasible use solar powered lighting.
 - Maximize the planting of shade trees in landscaping and parking lots.
 - Use light colored paving and roofing materials.
 - Use passive heating, natural cooling, solar hot water systems, and reduced pavement.
 - Utilizing only Energy Star heating, cooling, and lighting devices, and appliances.
 - Limit the hours of operation of outdoor lighting.
 - Install energy efficient heating and cooling systems, appliances and equipment, and control systems.

Other

- Require use of water-based or low VOC cleaning products.

Additional Operational/Greenhouse Gas Mitigation Measures

3. A substantial portion of the project's significant operational emissions are a result of marine vessels and harbor craft equipment. Therefore, the AQMD staff recommends that in addition to the operational mitigation measures identified in comment number two above the lead agency consider providing mitigation measures that require hybrid technologies and higher tiered engines for marine vessels and harbor craft equipment utilized for the project's operations. Further, the lead agency should provide additional discussion on the feasibility of implementing mitigation measures for hybrid technologies and higher tiered engines applicable to the project's marine vessel fleet and auxiliary equipment inventory.