



South Coast Air Quality Management District

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Review of the Draft Mitigated Negative Declaration (Draft MND) for the Proposed Baker Cold Storage Facility Project

The South Coast Air Quality Management District (SCAQMD) 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 document as appropriate.

Based on a review of the Draft MND the SCAQMD staff is concerned that the lead agency did not use the correct thresholds to determine air quality impacts and did not analyze all operational emissions for the proposed in the air quality analysis. Additional clarifying information should also be provided to substantiate portions of the air quality analysis. As a result, the lead agency has not fully demonstrated that the proposed project will have less than significant air quality impacts.

Specifically, the 92 lbs/day of operational NO_x emissions were apparently inadvertently compared to the 100 lb/day construction threshold to determine significance, whereas the operational NO_x threshold is actually 55 lbs/day (correctly reported on page 36 of the MND). Without further mitigation, it appears that the project has significant emissions. We recommend that either additional mitigation be implemented (such as requiring 2010 standard trucks) to reduce this impact to a less than significant level, or an environmental impact report be prepared to disclose the significant impact.

In addition, on page 25 of the Draft MND the lead agency indicated that the proposed project will require back-up generators; however, the lead agency did not specify this piece(s) of equipment in the air quality analysis nor quantify the emissions from this source. As we are potentially a responsible agency for portions of this project that may require a permit, SCAQMD staff recommends that the lead agency revise the Draft MND to account for the air quality impacts from the back-up generators and any other potential sources that would require a permit.

Lastly, two parameters related to trucking emissions should be further clarified in any revised CEQA analysis for this project. First, we could not find any justification for the trip rate of 120 trucks per day presumed in the air quality analysis. As this rate is lower than the rate recommended in CalEEMod guidance, further information should be provided justifying this rate. For example, with 38 docks, the facility could handle approximately three trucks per dock per day, or one truck per dock per shift (assuming 24 hour operations). It is not clear that this operational limitation is real based on the information provided. Further information should be provided about the operational limits of the facility to justify the trip rate used. Secondly, the assumption of 5 minutes of idling per trip may not account for multiple idling points within the facility. SCAQMD staff recommends that the analysis consider 15 minutes of idling per trip to account for idling at the dock, queuing at the entrance, queuing at the exit, etc.

In the event that the revised air quality analysis results in significant air quality impacts the SCAQMD staff recommends that the lead agency require mitigation pursuant to Section 15370 of the CEQA Guidelines that could minimize or eliminate these impacts. A list of applicable mitigation measures can be found on the SCAQMD's CEQA webpage at the following internet address:

www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.htm

Pursuant to Public Resources Code Section 21092.5, SCAQMD staff requests that the lead agency provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the final environmental document. 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,



Ian MacMillan

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

IM:DG

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