



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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**Draft Supplemental Environmental Impact Report (SEIR) for the
Proposed District at South Bay Specific Plan Amendment Project (Proposed Project)
(SCH No.: 2005051059)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The City of Carson is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. The following comments on the Draft SEIR include recommended revisions to the CEQA air dispersion modeling parameters and the localized NO₂ air quality impact analysis, recommended revisions to two existing project design features and one mitigation measure, and a discussion of South Coast AQMD permits that the Lead Agency should include in the Final SEIR.

Based on the Draft SEIR, the Proposed Project consists of construction and operation of 1,250 residential units, 745,300 square feet of commercial uses, 1,567,090 square feet of light industrial uses, and 273,906 square feet of park amenities/passive open space on a 157-acre site. The Proposed Project is located at 20400 South Main Street on the southeast corner of East Del Amo Boulevard and East Main Street within the City of Carson in the designated AB 617 Wilmington, Carson, West Long Beach community.

The Proposed Project site was formerly developed as a Class II Landfill site between 1959 through 1965 and received 6.2 million cubic yards of solid municipal waste and 7.8 million cubic yards of waste during operations. Since landfill closure, the site has undergone remediation activities under direction of two Remedial Action Plans (RAPs) prepared and approved by the Department of Toxic Substances Control (DTSC). The RAPs divided the 157-acre site into the Lower Operable Unit and the Upper Operable Unit, and each RAP was subject to separate CEQA clearance. As part of remediation efforts, Landfill Gas Control and Collection System components have been installed onsite, and additional components such as horizontal and vertical collector wells and piping will be installed in the future.

The Lead Agency has previously prepared several CEQA documents for the Proposed Project since 2006. The original 2006 Final EIR analyzed construction and operation of 1,995,125 square feet of commercial uses and 1,550 residential units¹. The Proposed Project was revised in 2018 to include construction and operation of 1,601,500 square feet of commercial uses, 1,250 residential units, and 350 hotel rooms. The City of Carson prepared a Final SEIR (also referred

¹ Draft SEIR. Page II-8 to II-11.

to as the 2018 Final SEIR) to analyze these changes² and certified it before approving the changes (referred to as the approved Project). The approved Project and the Proposed Project presented in this 2021 Draft SEIR remain unchanged in Planning Area (PA) 1 and PA 2; however, the Proposed Project analyzed in this 2021 Draft SEIR replaces the commercial uses in the approved Project with 1,567,090 square feet of light industrial uses and park amenities/passive open space³.

Construction of the Proposed Project is anticipated to occur in nine phases over three planning areas (PA 1, PA 2, and PA 3) and will begin in 2022. Beginning in 2024, PA 3 will be fully operational; PA 2 will follow in 2025; and PA 1 will be the last to be operational by 2026⁴. Construction within each PA will consist of remediation and relocation of landfill trash with backfilling, as required⁵. The Proposed Project will include 24 project design features for air quality. These features include requiring the use of Tier 4 construction equipment, or zero-emissions equipment where available, and 2014 or newer diesel fueled on-road heavy-duty haul trucks during construction activities, among others. During operations, project design features include a leasing preference to tenants with facility-owned and operated fleets that are alternative-fueled or zero-emissions, and a requirement that all owned or contracted fleets must meet or exceed 2014 model-year emissions standards, among others⁶. Once operational, the Proposed Project is anticipated to generate 42,791 trip-ends per day, 1,418 of which would be made by light-, medium-, and heavy-heavy-duty trucks traveling to and from PA 2 and PA 3⁷. Although the tenant for the Proposed Project is unknown, the Proposed Project may include up to 76,379 square feet of refrigerated logistics uses; therefore, 39 trucks are anticipated to include transportation refrigeration units (TRUs)⁸. However, only trucks with electric TRUs will be permitted to operate within the light industrial portion of PA 3, therefore only seven of the 39 trucks were analyzed as using a diesel-fueled TRU in the Draft SEIR⁹. Based on the Draft SEIR, existing off-site sensitive receptors are located to the south and west of the Project site, directly adjacent to the Proposed Project¹⁰.

Based on a review of the Draft SEIR and supporting technical documents, South Coast AQMD staff has five main comments. A summary of these comments is provided as follows with additional details provided in the attachment.

1. CEQA Air Dispersion Modeling Parameters: The air dispersion modeling performed in the Draft SEIR represented all heavy-duty trucks idling as discrete point sources and utilized hour-of-day variable emissions for stationary and mobile sources. South Coast AQMD staff recommends the Lead Agency use volume sources in the air dispersion model to represent heavy-duty truck idling and adjust the hour-of-day variable emission scalar such that a

² *Ibid.*

³ *Ibid.* Page II-15.

⁴ *Ibid.* Page IV.D-25.

⁵ *Ibid.* Page II-45.

⁶ *Ibid.* Pages IV.D-38 to IV.D-43.

⁷ *Ibid.* Page IV.E-14.

⁸ *Ibid.* Pages IV.D-31 to IV.D-32.

⁹ *Ibid.*

¹⁰ Draft SEIR. Page IV.D-7.

complete emission inventory for annual concentrations, which will then be used in HARP2 to calculate cancer risks, is modeled in the Final SEIR.

2. CEQA Air Quality Impact Analysis – Localized NO₂ Impacts Analysis: The Lead Agency analyzed the Proposed Project’s localized NO₂ impacts by modeling the Project’s own NO₂ concentrations and adding the peak concentration to a three-year average background NO₂ concentration. The Lead Agency should use the peak observed NO₂ background concentration over a three-year period instead of an averaged three-year background concentration to calculate the Proposed Project’s NO₂ concentrations in the Final SEIR.
3. Recommended Revisions to Existing Project Design Features (PDFs): The Lead Agency requires the use of clean off-road construction equipment if commercially available (2021 SEIR PDF-C1). Additional information on how commercial availability will be determined should be provided in the Final SEIR. Additionally, the Lead Agency should expand the requirement for using alternative-fueled and zero-emissions trucks during operation to all trucks accessing the Proposed Project, not limited to those trucks that are owned or contracted by warehouse tenants (2021 SEIR PDF-O16).
4. Recommended Revisions to Existing Mitigation Measure (MM) G-7: The Lead Agency will require implementation of MM G-7 to reduce significant VOC emissions from architectural coatings to 74.9 pounds per day (lbs/day) by requiring either the use of low VOC content architectural coatings or no overlapping architectural coating phases. South Coast AQMD staff recommends the Lead Agency strengthen MM G-7 to include both requirements in the Final SEIR.
5. Responsible Agency and South Coast AQMD Permits: Since the Proposed Project will require the use of six new stationary source emergency generators, permit(s) from South Coast AQMD will be required. Additionally, due to ongoing remediation efforts that involve landfill excavation and landfill gas management, implementation of the Proposed Project may require additional permit(s) or plan approvals from South Coast AQMD. Therefore, the Lead Agency should identify South Coast AQMD as a CEQA Responsible Agency for the Proposed Project in the Final SEIR and consult early with South Coast AQMD Engineering and Permitting.

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 contact Alina Mullins, Air Quality Specialist, at amullins@aqmd.gov, should you have any questions or wish to discuss the comments.

Sincerely,

Lijin Sun

Lijin Sun

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment
LS:AM
LAC211102-02
Control Number

ATTACHMENT**South Coast AQMD Staff's Summary of Air Quality Analysis and Health Risk Assessment in the Draft SEIR**

In the Air Quality Analysis Section of the Draft SEIR, the Lead Agency quantified the Proposed Project's maximum daily construction and operational emissions and compared them to the respective South Coast AQMD's recommended regional and localized CEQA air quality significance thresholds. Additionally, the analysis was also compared against the air quality impact findings from the 2018 Final SEIR to determine if the 2021 Draft SEIR would result in new impacts or those that were more severe than those found in the 2018 Final SEIR.

Construction emissions in this Draft SEIR included emissions from landfill excavation, hauling due to trash relocation, and up to 450,000 cubic yards of soil import activities¹¹. Additionally, both the construction and operational impacts analysis accounted for emission reductions associated with implementation of 24 project design features (PDFs). PDFs for construction include, but are not limited to, the following: requirements for construction equipment to meet Tier 4 standards or Tier 3 standards at minimum with zero-emissions equipment to be incorporated as available; mobile off-road construction equipment less than 50 horsepower to be electric; idling restrictions of 2 minutes per occurrence; and on-road diesel fueled haul trucks to be model year 2014 or greater. For operation, PDFs include, but are not limited trip demand measures; electric landscaping equipment; minimum of 251 parking spaces be equipped with electric vehicle charging; electric on-site cargo handling equipment; electric plugs for TRUs and restrictions for diesel TRUs in PA 3; leasing preference to facility-owned and operated fleets that are alternative or zero emission; requirements for all owned or contracted fleets to meet or exceed 2014 model year emission standards; and lastly, tenants must ensure that all 75 percent of trucks model year 2021 and newer will be zero- or near-zero emissions by 2035 and 100 percent by 2040.

Based on the analysis, the Lead Agency found that construction of the Proposed Project would result in 113 pounds per day (lbs/day) of VOC emissions¹², which is above South Coast AQMD's CEQA significance threshold for regional construction VOC emissions at 75 lbs/day. Mitigation Measure (MM) G-7 would require the use of low VOC content architectural coatings or require a restriction on overlapping architectural coating activities between PA 1 and PA 2. With implementation of this mitigation measures, regional construction VOC emissions were reduced to less than significant between 64 lbs/day to 74.9 lbs/day, depending on which portion of MM G-7 is selected¹³.

The Lead Agency also found that that the Proposed Project's regional operational air quality impacts would be significant for VOC, NO_x, CO, PM₁₀, and PM_{2.5}¹⁴. Implementation of MMs G-12 to G-13, G-15 to G-21, G-25, G-29, and C-18 would require various emission reduction measures such as energy efficient lighting; delivery schedules that avoid overlap or peak hours; priority parking for clean air vehicles; implementation of a transportation demand management

¹¹ Draft SEIR. Appendix D 1 Assumptions and 2 Air Quality Calculations.

¹² *Ibid.* Table IV.D-6, Page IV.D-51.

¹³ *Ibid.* Page IV.D-78.

¹⁴ *Ibid.* Table IV.D-7, Page IV.D-52.

program. However, the Lead Agency found that operation of the Proposed Project would still result in significant and unavoidable air quality impacts for VOC, NOx, CO, PM10, and PM2.5¹⁵. The Lead Agency also quantified air quality impacts from overlapping construction and operation activities and compared the overlapping emissions to South Coast AQMD's recommended air quality CEQA significance threshold for operation. Based on the analysis, the Lead Agency found that overlapping activities would result in significant and unavoidable air quality impacts for VOC, NOx, CO, PM10, and PM2.5¹⁶.

In the Draft SEIR, the Lead Agency quantified the Proposed Project's localized construction and operational emissions and compared them to the applicable South Coast AQMD's localized significance thresholds. Based on the analysis, the Lead Agency found that the Proposed Project's localized construction and operational air quality impacts would be less than significant¹⁷.

Additionally, the Lead Agency calculated cancer risks from Proposed Project's construction and operational activities and took into consideration the cancer risk to the on-site residential receptors being developed in PA 1 of the Proposed Project for informational purposes only. Based on the analysis, the Lead Agency found that the cancer inhalation risk from construction activities would be 4.41 in one million; cancer inhalation risk from operation would be 1.1 in one million¹⁸. Both construction and operational cancer risks were found to be below South Coast AQMD's CEQA significance threshold of 10 in one million for cancer risk¹⁹. Finally, the Lead Agency discussed South Coast AQMD Rules 2305 and 316 in the Draft SEIR²⁰.

South Coast AQMD staff's detailed comments on the Draft SEIR are provided as follows.

1. CEQA Air Dispersion Modeling Parameters

Based on a review of the air dispersion modeling performed using AERMOD, South Coast AQMD staff has the following comments regarding the modeling parameters.

a) Truck Idling Modeled as Point Sources

South Coast AQMD staff found that the Lead Agency modeled truck idling as discrete point sources in various locations within the Proposed Project site. The Proposed Project will have 1,418 daily truck trips. Due to the nature of warehousing and commercial operations, it is reasonably foreseeable that truck idling may occur across the entire Proposed Project site including ingress or egress from the site, and not limited to discrete locations modeled in AERMOD. Additionally, modeling point sources in AERMOD requires specific information about a source's stack, such as the temperature, velocity, and flow rate exiting the stack and the stack's diameter. It is reasonably foreseeable that the Proposed Project will service a diverse truck fleet with different engines and exhaust systems, and that not every truck will have stack

¹⁵ *Ibid.* Page IV.D-73.

¹⁶ *Ibid.* Page IV.D-54.

¹⁷ *Ibid.* Pages IV.D-55 to IV.D-62.

¹⁸ *Ibid.* Page IV.D-64.

¹⁹ South Coast AQMD's CEQA significance threshold of 10 in one million for cancer risk is based on the most current methodology recommended by the California Office of Environmental Health Hazard assessment.

²⁰ Draft SEIR. Pages IV.G-13 to IV.G-14.

parameters similar to the ones used in the modeling. Therefore, South Coast AQMD staff recommends that the Lead Agency use a series of volume sources to account for onsite truck idling. Alternatively, the Lead Agency can provide additional information to justify that modeling truck idling as discrete point across the Proposed Project site is appropriate. When modeling idling emissions from a truck with cargo container as a point source, it is important to note that the cargo container has a downwash effect on the plume released from nearby stacks such that wind flowing over or around the container creates a cavity of recirculating winds in the area near the container, and the cavity causes increased vertical dispersion of plumes emitted from stacks on or near the container. Therefore, the building downwash parameters should be used in AERMOD.

b) Use of Hour-of-Day Variable Emissions

The Lead Agency modeled multiple stationary and mobile sources using the hour-of-day variable emission factor option in AERMOD to account for the sources' non-continuous operations. The stationary and mobile sources were assumed to operate for only 16 hours per day²¹. The resulting concentrations were then used to calculate construction and operational cancer risks using HARP2. However, in doing so, the Lead Agency did not properly account for concentrations from non-continuous operations. According to the HARP2 User Guide, in order to maintain a consistent emission inventory when the hour of day option is selected, annual emissions are required to sum to 31,536 kg/yr (i.e. $31,536 \text{ kg/yr} = 1 \text{ g/s} * 3600 \text{ s/hr} * 8760 \text{ hr/yr}$)²². Because of this requirement, hourly emissions should be adjusted accordingly when using variable emissions. For example, if the stationary sources will only operate for 16 hours a day, then an adjustment to the variable emission scalar is needed and should be 1.5 (i.e. $1.5 \text{ g/s} * 3600 \text{ s/hr} * 5,840 \text{ hr/yr} = 31,536 \text{ kg/yr}$).

2. CEQA Air Quality Impacts Analysis – Localized NO2 Impacts Analysis

In the Draft SEIR, the Lead Agency analyzed the Proposed Project's localized NO2 impacts by modeling the Proposed Project's own NO2 concentrations in AERMOD and adding the resulting maximum concentration from the Proposed Project itself to a three-year average background concentration²³. Based on this analysis, the Lead Agency found that localized NO2 impacts would be less than significant. The Lead Agency's use of a three-year average background concentration is not appropriate. As discussed in the South Coast AQMD's Final Localized Significance Threshold Methodology, when determining whether or not construction activities would create a significant adverse localized air quality impacts, the observed peak concentrations for a three-year period should be utilized²⁴. Therefore, South Coast AQMD staff recommends the Lead Agency revise the localized NO2 impacts analysis to identify the peak background NO2 concentration observed over the last three years of available monitoring data (not a three-year average NO2 background concentration) and add that concentration to the Proposed Project's own peak NO2 concentration for comparison to the NAAQS and CAAQS.

²¹ Draft SEIR. Appendix D. 5d.iii.

²² User Manual for HARP2. Pages 31 to 32. Accessed at:

<https://ww2.arb.ca.gov/sites/default/files/classic/toxics/harp/docs2/harp2admruserguide.pdf>

²³ Draft SEIR. Appendix D. The District at South Bay LST - Monitoring Data. PDF page 110.

²⁴ South Coast AQMD Final Localized Significance Threshold Methodology. Accessed at:

<http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf>

3. Recommended Revisions to Existing Project Design Features (PDFs)

a) *2021 SEIR PDF-C1*

2021 SEIR PDF-C1 requires that during construction, all off-road equipment meet Tier 4 Final emission standards, with a minimum requirement to meet Tier 3 standards if Tier 4 is not commercially available when construction begins. Additionally, the PDF requires that zero-emission construction equipment be incorporated when commercially available. South Coast AQMD staff recommends that the Lead Agency provide additional information on how “availability” will be defined and determined in the Final SEIR. The recommended information would establish a clear set of standards and criteria for assessing the commercial availability and feasibility of using both Tier 4 Final and zero-emission construction equipment, provide public transparency in the Lead Agency’s decision-making regarding Tier 4 Final and zero-emission construction equipment, demonstrate a commitment by the Lead Agency to using Tier 4 Final and zero-emission construction equipment, ensure implementation of Tier 4 Final and zero-emission construction equipment when it is available, strengthen the Proposed Project’s mitigation monitoring and reporting program, and facilitate the purpose and goal of CEQA on public disclosure.

b) *2021 SEIR PDF-O16*

2021 SEIR PDF-O16 requires 1) for the industrial uses within PA 3, a leasing preference will be given to prospective tenants that have facility-owned and operated fleets that are alternative or zero-emissions; 2) all owned and contracted fleets shall meet or exceed the 2014 model-year emissions equivalent engine standards; 3) light industrial tenants will ensure that all truck models 2021 and newer are 75 percent zero-emissions or near-zero emissions by 2035 and 100 percent zero-emissions or near-zero emissions by 2040; and 4) all operators are to maintain records demonstrating compliance with these requirements and make the records available for inspection purposes. Since the Proposed Project will have different tenants/owners and operators and to further reduce the Proposed Project’s significant and unavoidable NOx emissions during operation, South Coast AQMD staff recommends that the Lead Agency strengthen the PDF as follows to require the use of alternative-fueled and zero-emissions trucks during operation by all trucks accessing the Proposed Project, not limited to those trucks that are owned or contracted by warehouse tenants. This recommendation would support and facilitate implementation of South Coast AQMD Rule 2305 – Warehouse Indirect Source Rule.

2021 SEIR PDF-O16: For the uses within PA 3(a), leasing preference shall be given to prospective tenants with facility-owned and operated fleet that is alternative/zero-emissions. At a minimum, warehouse tenants/owners and/or operators shall ensure that all truck fleets accessing the Proposed Project’s industrial uses ~~All owned and contracted fleets~~ shall meet or exceed the 2014 model-year emissions equivalent engine standards as currently define in the California Code of Regulations title 13, Division 3, Chapter 1, Article 4.5. Section 2025. Light Industrial tenants shall ensure that of all trucks of model year 2021 and newer 75 percent will be zero- or near-zero-emission vehicles by 20235, and 100 percent zero- or near-zero-emission vehicles by 2040. Facility operators shall maintain records on site

demonstrating compliance with this requirement and shall make records available for inspection by local jurisdiction, air districts, and the State upon request.

4. Recommended Revisions to Existing Mitigation Measure (MM) G-7

In the Draft SEIR, the Lead Agency found that the Proposed Project would result in 64 lbs/day to 74.9 lbs/day of VOC emissions after implementation of MM G-7, which offers two mutually exclusive options to reduce VOC emissions from architectural coating during construction. These options require that either the construction contractor ensure that architectural coatings have either low or no VOC content, or that architectural coating activities between PA 1 and PA 2 do not overlap. Since it is not known at this time what option within MM G-7 will be utilized, VOC emissions from construction may be 74.9 lbs/day, which is just slightly below South Coast AQMD's recommended CEQA significance threshold for VOC emissions during construction at 75 lbs/day. CEQA requires that the Lead Agency consider all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse impacts. Therefore, South Coast AQMD staff recommends that the Lead Agency revise MM G-7 as follows to require both options be utilized to further reduce VOC emissions during construction:

Mitigation Measure G-7: To reduce VOC emissions associated with construction activities, the contractor for PA 1 shall ensure that VOC emissions from architectural coating activities have low/no VOC content ~~or~~ and ensure that architectural coating activities for PA 1 do not occur at the same time as architectural coating activities for PA 2.

5. Responsible Agency and South Coast AQMD Permits

The Draft SEIR contemplates the use of six new stationary source emergency generators to be installed and operated within the industrial area of the Proposed Project. Since implementation of the Proposed Project requires the use of stationary equipment, including but may not be limited to, emergency generator(s), permits from South Coast AQMD are required. Additionally, due to the site's historical usage as a former landfill and due to the ongoing remediation efforts, including landfill excavation and waste relocation, implementation of the Proposed Project may require additional permits or landfill excavation plans to be approved by South Coast AQMD. Therefore, South Coast AQMD staff recommends the Lead Agency consult with South Coast AQMD Engineering and Permitting to identify additional South Coast AQMD rules and regulations that the Proposed Project may be subject to. The Final SEIR should include a list of stationary equipment that will require South Coast AQMD permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project. Any assumptions used in the Final SEIR will be used as the basis for permit conditions and limits for the Proposed Project. The 2015 revised Office of Environmental Health Hazard Assessment (OEHHA) methodology is being used by South Coast AQMD for determining operational health risks for permitting applications and also for all CEQA projects where South Coast AQMD is the Lead Agency. Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions on permits. For more general information on permits, please visit South Coast AQMD's webpage at: <http://www.aqmd.gov/home/permits>.

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 SEIR. 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. Further, if the Lead Agency makes the findings that the recommended revisions to existing 2021 SEIR PDF-C1, 2021 SEIR PDF-O16, and MM G-7 are not feasible, the Lead Agency should describe the specific reasons supported by substantial evidence for rejecting them in the Final SEIR (CEQA Guidelines Section 15091).