



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Draft Environmental Impact Statement/Environmental Impact Report (Draft EIS/EIR) for the Proposed East San Pedro Bay Ecosystem Restoration Feasibility Study (SCH No. 2019129006)

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 EIS/EIR.

South Coast AQMD Staff's Summary of Project Description

The Lead Agency is evaluating aquatic ecosystem function and structure to restore and improve biodiversity for kelp, rocky reef, eelgrass habitats, and other types historically present in San Pedro Bay to support diverse resident and migratory species (Proposed Project). The Proposed Project encompasses 18 square miles and is located offshore in the eastern portion of San Pedro Bay, offshore from the City of Long Beach, California. The Proposed Project includes the No Action Plan (Alternative 1) and three action alternatives, each with components, as follows:

1. Alternative 2 – Kelp Restoration Plan: Introduce three habitat types including extensive kelp beds, nearshore rocky reef and eelgrass, creating a horseshoe shaped benefit area in the Bay on 162 acres. Construction is expected to take 30 months¹.
2. Alternative 4A – Reef Restoration Plan: Introduces a productive new habitat type of rocky reef placed along Island Chaffee (oil island) on 200 acres. Construction is expected to take 37 months².
3. Alternative 8 – Scarce Habitat Restoration Plan: restores three scarce habitat types, a sandy island, coastal wetlands, and oyster beds, aquatic habitat types on 372 acres. Construction is expected to take 53 months³.

Implementation of each action alternatives requires sand dredging operations and material deliveries and transportation of stones from the Western Riverside County located in the South Coast Air Basin⁴.

South Coast AQMD Staff's Comments

The Lead Agency is committed to implementing 12 best management practices for air quality that are built in to the action alternatives for the Proposed Project⁵. To further reduce the Proposed Project's construction emissions, South Coast AQMD staff recommends that the Lead Agency review and incorporate the following revisions to AQ-3 and AQ-6 in the Final EIS/EIR.

¹ Draft EIS/EIR. Page xv.

² Draft EIS/EIR. Page xvii.

³ Draft EIS/EIR. Page xviii.

⁴ Draft EIS/EIR. Pages 5-39 – 5-50.

⁵ Draft EIS/EIR. Pages 4-69 – 4-70.

Zero-Emission or Near-Zero Emission Construction Vehicles

1. The Lead Agency is committed to using “all on-road construction vehicles would meet all applicable California on-road emission standards and would be licensed in the State of California⁶” (AQ-3). South Coast AQMD staff recommends that the Lead Agency revise AQ-3 to include additional information as follows. The recommended information establishes a clear set of construction vehicles that will be used, provides public transparency in the Lead Agency’s decision-making regarding the use of clean construction vehicles, demonstrates a commitment by the Lead Agency to using clean construction vehicles, ensures implementation of clean construction vehicles during project implementation, strengthens the Lead Agency’s environmental commitments for air quality, and facilitates the purpose and goal of CEQA on public disclosure.
 - a) Require the use of zero-emission (ZE) or near-zero emission (NZE) on-road trucks during construction, such as trucks with natural gas engines that meet the California Air Resources Board’s (CARB) adopted optional NOx emission standard at 0.02 grams per brake horsepower-hour (g/bhp-hr). At a minimum, the Lead Agency may require that operators of heavy-duty trucks visiting the Proposed Project during operation commit to using 2010 model year or newer engines that meet CARB’s 2010 engine emission standards of 0.01 g/bhp-hr for particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks. When requiring ZE or NZE on-road haul trucks, the Lead Agency should include analyses to evaluate and identify sufficient power and supportive infrastructure available for ZE/NZE trucks in the Energy and Utilities and Service Systems Sections of the Final EIS/EIR, where appropriate.
 - b) To monitor and ensure ZE, NZE, or 2010 model year trucks are used at the Proposed Project, the Lead Agency should require that operators maintain records of all trucks associated with the Proposed Project’s construction and make these records available to the Lead Agency upon request. The records will serve as evidence to prove that each truck called to the Proposed Project during construction meets the minimum 2010 model year engine emission standards. Alternatively, the Lead Agency should require periodic reporting and provision of written records by contractors and conduct regular inspections of the records to the maximum extent feasible and practicable

Electric Dredging Equipment

2. The Lead Agency is committed to using dredging equipment during construction and maintenance that will be licensed in California and meet the model year 2010 (Tier 4 Final) or newer emission standards for san dredging operations (AQ-6). South Coast AQMD staff recommends that the Lead Agency maximize the use of electric dredging equipment to the fullest extent feasible.

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 EIS/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

⁶ Draft EIS/EIR. Page 4-69.

the Proposed Project. Further, if the Lead Agency makes the finding that the recommended revisions to AQ-3 and AQ6 not feasible, the Lead Agency should describe the specific reasons supported by substantial evidence for rejecting them in the Final EIS/EIR (CEQA Guidelines Section 15091).

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 me at (909) 396-3308, should you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

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