



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

E-MAILED: May 1, 2013

May 1, 2013

mbush@planning.lacounty.gov

Ms. Michele Bush, Project Planner
Department of Regional Planning
Zoning Permits East Section
County of Los Angeles
320 West Temple Street
Los Angeles, CA 90012

**Draft Mitigated Negative Declaration (Draft MND) for the Proposed 43-Unit
Affordable Housing/Mixed Use Project in Unincorporated Arcadia
(Project No. R2012-02952-(5))**

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 Mitigated Negative Declaration.

In the project description, the lead agency proposes the construction of a 43-unit affordable housing/mixed use project on a 1.44 acre site. In its air quality analysis, the lead agency estimated project short- and long-term emission impacts using the URBEMIS2007 land use computer model. Upon request, the lead agency sent the modeling output to the SCAQMD staff for review. For future CEQA documents and inclusion in this Final MND, the SCAQMD staff recommends, at minimum, that summary results of any air quality analysis be included in any applicable CEQA document circulated for public review. This can be done as part of the narration, a table(s), or as an appendix. Emission impacts should also be compared with recognized thresholds of significance in order to further demonstrate that project impacts are less than significant. In addition, the SCAQMD staff recommends using the California Emissions Estimator model (CalEEMod)¹ current land use model to estimate project impacts. This model also includes readily available on-site emissions data that can be used to compare with localized significance thresholds to determine if project localized impacts are less than significance. Besides quantification of direct emissions from construction and operations (including vehicle use), as well as indirect emissions, such as GHG emissions from energy use, solid waste disposal, vegetation planting and/or removal, and water use, this model incorporates Pavley standards and Low Carbon Fuel standards into the mobile source emission factors. Further, the model identifies

¹ The current California Emission Estimator Model (CalEEMod) accessible at <http://www.aqmd.gov/ceqa/models.html>.

mitigation measures to reduce criteria pollutant and GHG emissions along with calculating the benefits achieved from measures chosen by the user. The GHG mitigation measures were recently developed and adopted by the California Air Pollution Control Officers Association (CAPCOA).

In addition, the lead agency has determined in the air quality section that the proposed project would result in no air quality impacts although the computer modeling showed estimated emission impacts for project construction and operations. Since the modeling output indicates that emissions are being generated, the lead agency should review its determination in the Final MND based on those emissions estimates to see if project impacts would be better characterized by one of the other determination categories. Finally, based on the surrounding land uses and setting on page one of the Draft MND and upon an aerial map inspection, the proposed project is located within one-quarter mile of sensitive receptors (residences) south, east and west of the project site. Therefore, the SCAQMD requests that the lead agency evaluate localized air quality impacts to ensure that any nearby sensitive receptors are not adversely affected by the construction activities that are occurring in close proximity.² Should the lead agency conclude after its analyses that localized construction or operational air quality impacts exceed the SCAQMD's daily significance thresholds, staff has compiled mitigation measures to be implemented if the air quality impacts are determined to be significant.³

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final MND. The SCAQMD staff would be available to work with the Lead Agency to address these issues and any other air quality questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,



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

IM:GM

LAC130328-04
Control Number

² SCAQMD guidance for performing a localized air quality analysis can be found at the following web address: <http://www.aqmd.gov/ceqa/handbook/LST/LST.html> .

³ Mitigation measure suggestions can be found at http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html .