



South Coast Air Quality Management District

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Planning Division
24300 Narbonne Avenue
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**Draft Negative Declaration (Draft ND) for the Proposed
Schiappa Homes Mixed-Use Project, 25114-8 Narbonne Avenue
(ND #2015-01; CUP No. 293; VTTM 073112)**

The South Coast Air Quality Management District (SCAQMD) 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 Negative Declaration.

In the project description, the Lead Agency proposes to demolish two existing residential units followed by the construction of 11-new three-story townhouse units along with 3,500 square feet of office/retail uses on a one-half acre parcel. The proposed development will also include 24-enclosed garage parking spaces, two guest spaces and 12 commercial spaces. Since the project includes demolition, SCAQMD Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities is applicable. The Lead Agency should therefore include how the Lead Agency will comply with SCAQMD Rule 1403 in the Final ND.

In the air quality analysis, the Lead Agency estimated regional air quality impacts using the URBEMIS2007 land use computer model. Based on current SCAQMD guidance, the SCAQMD staff no longer recommends using URBEMIS2007 to estimate project impacts. For this Draft ND and future CEQA documents, the SCAQMD staff recommends revising the air quality analysis using the current land use model from the California Air Resources Board (CARB), the California Emissions Estimator Model (CalEEMod).¹ The CalEEMod land use model has been available since 2011 and uses updated fleet vehicle information. CalEEMod also includes on-site emissions data that can readily be used to estimate localized air quality impacts along with project GHG emissions. Besides demolition and debris hauling, the Final ND should also account for any excavation, soil import/export related emissions including emissions from soil hauling emissions, as applicable.

It is also recommended that the Lead Agency evaluate localized air quality impacts since it is noted in an aerial map inspection and in the Draft ND that the proposed project is located within one-quarter mile of sensitive receptors (residential properties) surrounding 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. SCAQMD guidance for performing a localized

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

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air quality analysis can also be found at the SCAQMD website². Should the Lead Agency conclude after its analyses that construction or operational air quality impacts exceed the SCAQMD daily significance thresholds, staff has compiled mitigation measures³ to be implemented if the air quality impacts are determined to be significant.

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

Sincerely,

Jillian Wong

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JW:GM

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² <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>

³ <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>