



South Coast Air Quality Management District

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

SENT VIA E-MAIL AND USPS:
apezeshkpour@santa-ana.org

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Ali Pezeshkpour, Associate Planner
City of Santa Ana, Planning Division
20 Civic Center Plaza, Ross Annex M-20
PO Box 1988
Santa Ana, CA 92701

Draft Mitigated Negative Declaration (Draft MND) for the Proposed First Street Family Apartments Project

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The lead agency proposes to construct three apartment buildings totaling 100,653 sf. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final IS/MND.

In its air quality analysis, the Lead Agency estimated project emission impacts using CalEEMod (Version 2011.1.1) land use computer model. The current version of CalEEMod (Version 2013.2.2) uses the new EMFAC2011 and OFFROAD2011 emission factors rather than the outdated EMFAC2007 and OFFROAD2007 emission rates used in earlier versions of CalEEMod. For a more current estimate, the SCAQMD staff recommends using the latest CalEEMod (Version 2013.2.2) land use model for all future analyses.

The proposed project is also adjacent to sensitive land uses¹ (i.e., school to the south); however, the Draft MND did not evaluate potential localized air quality impacts resulting from construction of the proposed project. Therefore, the SCAQMD staff recommends that the Lead Agency revise the air quality analysis to include an assessment of potential localized air quality impacts during demolition and construction of the proposed project. These potential air quality impacts should be assessed using SCAQMD's Localized Significance Methodology and compared to the localized significance thresholds specific to the project area². In the event that the Lead Agency determines the proposed project will result in significant localized construction air quality impacts, the SCAQMD staff recommends that the Lead Agency require mitigation to minimize these impacts to a less than significant level. Additional construction-related air quality mitigation measures are available at:

http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html

¹ California Air Resources Board. April 2005. "Air Quality and Land Use Handbook: A Community Health Perspective." Accessed at: <http://www.arb.ca.gov/ch/landuse.htm>

² The Localized Significance Threshold (LST) methodology and Mass Rate LST Look Up Table is available at: <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>

The SCAQMD staff is available to work with the lead agency to address these concerns and any other air quality questions that may arise. Please contact Jack Cheng, Air Quality Specialist at (909) 396-2448, if you have any questions regarding these comments. We look forward to reviewing and providing comments for the Final IS/MND associated with this project.

Sincerely,

Jillian Wong

Jillian Wong, Ph.D.
Program Supervisor
Planning, Rule Development & Area Sources

JW:JC
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