



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Draft Environmental Impact Report (Draft EIR) for the Proposed City of Alhambra Draft General Plan, Vision 2040 – A Community Mosaic

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 EIR.

SCAQMD Staff's Summary of Project Description

The lead agency proposes the adoption of a draft general plan for the City of Alhambra, consisting of a comprehensive update of the City's current General Plan, and a vision for the future of Alhambra over the next 20+ years (proposed project).¹ The City of Alhambra is a built-out community totaling 4,899 acres, or 7.6 square miles. The proposed project covers the City of Alhambra, which encompasses approximately 4,899 acres, or 7.6 square miles, and intersects the Interstate-10 (I-10) and Interstate-710 (I-710) freeways.

SCAQMD Staff's Summary of Air Quality Analysis

Based on a review of the air quality section of the draft EIR, SCAQMD staff found that the lead agency did not quantify regional and localized impacts resulting from construction and operation of the proposed project. The lead agency estimated the proposed project's construction and operational emissions using CalEEMod and included the CalEEMod output file in Appendix D, but not within the Draft EIR. Therefore, SCAQMD staff recommends the lead agency include a discussion of these quantified emissions estimates within the air quality section of the draft EIR.

Further, the lead agency states that impacts to air quality are less than significant and no mitigation is required.² However, the CalEEMod output file in Appendix D demonstrates that the proposed project's operational emissions would be 70.43 lbs/day, which exceeds SCAQMD's CEQA significance threshold for operational emissions of 55 lbs/day.³ Upon review of the CalEEMod output file in Appendix D, SCAQMD staff found that the proposed project's mitigated operational emissions would be significant absent additional mitigation measures.

Although the lead agency did not conduct a localized significance thresholds (LST) analysis or a HRA analysis, the lead agency concluded that the proposed project would not expose sensitive receptors to substantial pollutant concentrations or diesel particulate matter (DPM). SCAQMD is concerned with this determination without the lead agency providing more substantive evidence. SCAQMD staff also recommends the lead agency adopt and implement additional mitigation measures provided in the attachment.

General Comments

SCAQMD staff has reviewed the air quality analysis in the draft EIR and has detailed comments on the methodology. Please see the enclosed attachment for more information. Additionally, as described in the

¹ Notice of Availability of a Draft EIR. Project Description

² Draft EIR. Page 77- Page 84

³ Draft EIR. Appendix D, *Air Quality and Greenhouse Gas Emissions Technical Data*. CalEEMod Run PDF, Page 11.

2016 AQMP, to achieve NOx emissions reductions in a timely manner is critical to attaining the National Ambient Air Quality Standard (NAAQS) for ozone before the 2023 and 2031 deadlines. SCAQMD is committed to attain the ozone NAAQS as expeditiously as practicable. The proposed project plays an important role in contributing to NOx emissions during operation. Therefore, SCAQMD staff recommends the lead agency adopt additional mitigation measures to further reduce NOx emissions as well as ROG, PM10, and PM2.5 emissions.

SCAQMD's 2016 Air Quality Management Plan

On March 3, 2017, the SCAQMD's Governing Board adopted the 2016 Air Quality Management Plan (2016 AQMP)⁴, which was later approved by the California Air Resources Board on March 23, 2017. Built upon the progress in implementing the 2007 and 2012 AQMPs, the 2016 AQMP provides a regional perspective on air quality and the challenges facing the South Coast Air Basin (Basin). The most significant air quality challenge in the Basin is to achieve an additional 45 percent reduction in nitrogen oxide (NOx) emissions in 2023 and an additional 55 percent NOx reduction beyond 2031 levels for ozone attainment.

Closing

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), SCAQMD staff requests that the lead agency provide SCAQMD staff with written responses to all comments contained herein prior to the certification of the Final 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)). Further, when the lead agency makes the finding that the recommended mitigation measures are not feasible, the lead agency should describe the specific reasons for rejecting them in the final EIR (CEQA Guidelines Section 15091).

SCAQMD staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Robert Dalbeck, Assistant Air Quality Specialist, CEQA- IGR Section, at (909) 396-2139 if you have any questions regarding the enclosed comments.

Sincerely,

Daniel Garcia

Daniel Garcia
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Attachment
DG/RD
LAC180803-05
Control Number

⁴ South Coast Air Quality Management District. March 3, 2017. *2016 Air Quality Management Plan*. Accessed at: <http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan>.

ATTACHMENT

Air Quality Analysis – Interim Milestone Years

1. The draft EIR analyzed operational year 2040 for the air quality analysis, however, it is not clear that year 2040 represents the proposed project's peak operational emissions. For example, higher emission rates from vehicles, trucks, and equipment in earlier years may result in higher peak daily emissions in early phases of the proposed project. Emission rates of vehicles, trucks, and equipment are generally higher in earlier years as more stringent emission standards and technologies have not been fully implemented, and fleets have not fully turned over. Therefore, SCAQMD staff recommends that the lead agency include interim milestone years (i.e., year 2020, year 2025, and year 2030) in the air quality analysis to ensure the peak daily emissions are identified and adequately disclosed in the Final EIR. The interim milestone years will also help demonstrate progress overtime from implementing air quality-related mitigation measures and policies included in the Draft EIR.

Air Quality Analysis – Overlapping Construction and Operational Impacts

2. Based on a review of the air quality analysis, SCAQMD staff found that the lead agency did not analyze construction activity overlapping with operational activity. Since the proposed project is expected to occur over a multi-year timeframe of 21 years from 2019 to 2040⁵, an overlapping construction and operation scenario is reasonably foreseeable, unless the proposed project includes requirement(s) that will prohibit overlapping construction and operational activities. To properly analyze a worst-case scenario that is reasonably foreseeable at the time the draft EIR is prepared, SCAQMD staff recommends that the lead agency revise the air quality analysis to identify the overlapping years by combining construction emissions (including emissions from demolition) with operational emissions, and compare the combined emissions to SCAQMD's air quality CEQA *operational* thresholds of significance to determine the level of significance in the final EIR. If upon revising the air quality analysis the lead agency determines that the proposed project's air quality impacts would be significant, mitigation measures will be required pursuant to CEQA Guidelines Section 15126.4. For more information on suggested potential mitigation measures as guidance to the lead agency, please see Comment No. 5 below and visit SCAQMD's CEQA Air Quality Handbook website.⁶

Air Quality Analysis – Localized Significance Thresholds (LSTs) Analysis

3. When specific development is reasonably foreseeable as a result of the goals, policies, and elements in the proposed project, the lead agency should identify any potential adverse air quality impacts and sources of air pollution that could occur using its best efforts to find out and a good-faith effort at full disclosure in a CEQA document. SCAQMD staff is concerned with this analysis. Please see detailed comments below.

Localized Significance Thresholds Analysis

To analyze and disclose a worst-case scenario that is reasonably foreseeable at the time the draft EIR is prepared, SCAQMD staff recommends that the lead agency use its best efforts, based on available project information (e.g. buildout dates, uses, building footprints or sizes) to quantify the proposed project's localized emissions and disclose the localized air quality impacts in the final EIR. SCAQMD guidance for performing a localized air quality analysis is available on the SCAQMD website.⁷ Alternatively, the lead agency should consider including a new air quality mitigation measure to require a project-level LST analysis prior to issuance of a grading permit as follows:

⁵ *Ibid.*

⁶ South Coast Air Quality Management District. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.

⁷ South Coast Air Quality Management District. Localized Significance Thresholds. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

Prior to the issuance of a grading permit for new development projects, the applicant/developer shall utilize the SCAQMD's Localized Screening Thresholds (LST) methodology to analyze the localized air quality impacts to sensitive receptors resulting from the proposed project. If the analysis shows that emissions would exceed SCAQMD's air quality CEQA localized thresholds for those emissions, the maximum daily grading activities of the proposed project shall be limited to the extent that could occur without resulting in emissions in excess of SCAQMD's significance thresholds for those emissions.

This mitigation measure ensures that the lead agency has adequately analyzed the proposed project's localized air quality impacts to justify deferring the LSTs analysis, that a project- or site-specific LSTs analysis will be completed in a later stage, and that any nearby sensitive receptors are not adversely affected by the proposed project's construction activities that are occurring in close proximity.

Health Risk Assessment (HRA) Analysis for Sensitive Receptors Near I-10 or I-710 Freeways

4. To facilitate the purpose and goal of CEQA on public disclosure, SCAQMD staff recommends that the lead agency use applicable project information that is available in the draft EIR to conduct a HRA analysis and to disclose the potential health risks in the final EIR.⁸ Additionally, it is recommended that the lead agency implement a project-design feature prohibiting the siting of new sensitive receptors near I-10 and I-710, or implement a mitigation measure requiring project-level HRAs to be conducted prior to the approval of projects near I-10 or I-710. This ensures that the lead agency adequately consider the proposed project's health impacts. Further, the lead agency should include a discussion regarding mitigation if a project-level HRA is found to exceed the SCAQMD's HRA thresholds.

Additional Considerations for Sensitive Receptors

- a) The lead agency should also consider requiring the use of enhanced filtration systems with maximum efficiency rating value (MERV) of 13 or better in residential units within 500 feet of I-10 and I-710 to ensure the maximum reduction of health risks from exposures to diesel particulate matter (DPM) emissions from vehicles and trucks traveling on the freeway.
- b) If enhanced filtration system is installed, it is important to consider the limitations. In a study that SCAQMD conducted to investigate filters,⁹ a cost burden is expected to be within the range of \$120 to \$240 per year to replace each filter. In addition, because the filters would not have any effectiveness unless the HVAC system is running, there may be increased energy costs to the residents. It is typically assumed that the filters operate 100 percent of the time while residents are indoors, and the environmental analysis does not generally account for the times when the residents have their windows or doors open or are in common space areas of the project. Moreover, these filters have no ability to filter out any toxic gases from vehicle exhaust. Therefore, the presumed effectiveness and feasibility of any filtration units should be carefully evaluated in more detail and disclosed to prospective residents prior to assuming that they will sufficiently alleviate exposures to DPM emissions.
- c) SCAQMD staff recommends that the lead agency make the following disclosures to prospective residents and include them as requirements in the final EIR.

⁸ "Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis," Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.

⁹ This study evaluated filters rated MERV 13 or better. Accessed at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf>. Also see also 2012 Peer Review Journal article by SCAQMD: <http://d7.iqair.com/sites/default/files/pdf/Polidori-et-al-2012.pdf>.

- Disclosure on potential health impacts to prospective residents from living in proximity to freeways and the reduced effectiveness of air filtration system when windows are open;
- Recommended schedules (e.g., once a year or every six months) for replacing the enhanced filtration units;
- Ongoing cost sharing strategies, if any, for replacing the enhanced filtration units;
- Identification of the responsible implementing and enforcement agency such as the lead agency for ensuring that enhanced filters are installed at residential units before a permit of occupancy is issued;
- Identification of the responsible entity such as Homeowners Association or property management for ensuring filters are replaced on time, if appropriate and feasible;
- Criteria for assessing progress in installing and replacing the enhanced filtration units; and
- Process for evaluating the effectiveness of the enhanced filtration units at the proposed project.

Additional Guidance for Siting Sensitive Receptors

- a) SCAQMD staff recognizes that there are many factors lead agencies must consider when making local planning and land use decisions. To facilitate stronger collaboration between lead agencies and SCAQMD to reduce community exposure to source-specific and cumulative air pollution impacts, SCAQMD adopted the *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning* in 2005¹⁰. This Guidance document provides recommended policies that local governments can use in their General Plans or through local planning to prevent or reduce potential air pollution impacts and protect public health. Therefore, it is recommended that the lead agency review this guidance document in addition to the California Air Resources Board's Guidance document, *Air Quality and Land Use Handbook: A Community Health Perspective*, prior to approving the proposed project.

Additional Recommended Mitigation Measures

5. CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate these impacts. SCAQMD staff recommends that the lead agency incorporate the following mitigation measures in the Final EIR to further reduce emissions, particularly from ROG, NOx, and particulate matter. Additional information on potential mitigation measures as guidance to the lead agency is available on the SCAQMD CEQA Air Quality Handbook website.
 - a) Require all off-road diesel-powered construction equipment meet or exceed Tier 4 off-road emissions standards. A copy of the fleet's tier compliance documentation, and CARB or SCAQMD operating permit shall be provided to the lead agency at the time of mobilization of each applicable unit of equipment. In the event that all construction equipment cannot meet the Tier 4 engine certification, the lead agency must demonstrate through future study with written findings supported by substantial evidence before using other technologies/strategies. Alternative strategies may include, but would not be limited to, reduction in the number and/or horsepower rating of construction equipment, limiting the number of daily construction haul truck trips to and from the proposed project, and/or limiting the number of individual construction project phases occurring simultaneously. Include this requirement as a bid or contract specification with contractors. Require periodic reporting and provision of written documents by contractors to prove and ensure compliance.
 - b) Require the use of 2010 model year diesel haul trucks that conform to 2010 EPA truck standards or newer diesel haul trucks (e.g., material delivery trucks and soil import/export) during construction,

¹⁰ South Coast Air Quality Management District. May 2005. "Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning" Accessed at: <http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf>.

and if the lead agency determines that 2010 model year or newer diesel haul trucks are not feasible, the lead agency shall use trucks that meet EPA 2007 model year NOx emissions requirements, at a minimum. Include this requirement as a bid or contract specification with contractors. Require periodic reporting and provision of written documents by contractors to prove and ensure compliance.

- c) Maximize use of solar energy including solar panels; installing the maximum possible number of solar energy arrays on the building roofs and/or on the Project site to generate solar energy for the facility.
- d) Limit parking supply and unbundle parking costs.
- e) Maximize the planting of trees in landscaping and parking lots.
- f) Use light colored paving and roofing materials.
- g) Install light colored “cool” roofs and cool pavements.
- h) Require use of electric or alternatively fueled sweepers with HEPA filters.
- i) Require use of electric lawn mowers and leaf blowers.
- j) Utilize only Energy Star heating, cooling, and lighting devices, and appliances.
- k) Use of water-based or low VOC cleaning products.

To further reduce particulate matter from the proposed project, SCAQMD staff recommends that the lead agency include the following mitigation measures in the Final EIR.

- a) Suspend all soil disturbance activities when winds exceed 25 mph as instantaneous gusts or when visible plumes emanate from the site and stabilize all disturbed areas.
- b) Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation.
- c) Sweep all streets at least once a day using SCAQMD Rule 1186, 1186.1 certified street sweepers or roadway washing trucks if visible soil materials are carried to adjacent streets (recommend water sweepers with reclaimed water).
- d) Apply water three times daily or non-toxic soil stabilizers according to manufacturers’ specifications to all unpaved parking or staging areas, unpaved road surfaces, or to areas where soil is disturbed. Reclaimed water should be used.