



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 Bowery Mixed-Use Project (SCH No.: 2019080011)

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 EIR.

South Coast AQMD Staff's Summary of Project Description

The Lead Agency proposes to redevelop existing light industrial buildings into 1,150 multi-family residential units, and commercial, retail, and restaurant uses totaling 212,121 square feet on 14.58 acres (Proposed Project). The Proposed Project is located on the southwest corner of Red Hill Avenue and Warner Avenue within the City of Santa Ana. Construction of the Proposed Project will occur over 27 months¹. It is anticipated that the Proposed Project will become operational by 2022².

South Coast AQMD Staff's Summary of Air Quality Analysis

The Lead Agency quantified the Proposed Project's construction emissions and compared those emissions to South Coast AQMD's recommended regional and localized CEQA air quality significance thresholds. Based on the analysis, the Lead Agency found that the Proposed Project's construction air quality impacts would be less than significant. The Lead Agency also quantified the net new operational emissions by subtracting operational emissions from the existing light industrial land uses from operational emissions estimated from the Proposed Project and compared the net new operational emissions to South Coast AQMD's recommended regional CEQA air quality significance thresholds for operation. Based on the analysis, the Lead Agency estimated that the net new volatile organic compounds (VOCs) emissions from the Proposed Project would be 63.62 pounds per day (lbs/day)³, which would exceed South Coast AQMD's recommended CEQA air quality significance threshold of 55 lbs/day. After implementation of Best Available Control Measures (BACM)-2, which requires the use of low VOCs paints that comply with South Coast AQMD Rule 1113 requirements⁴, the net new VOCs emissions would remain significant and unavoidable⁵.

Additional Recommended Mitigation Measures

CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse air quality impacts. To further reduce the Proposed Project's net new VOCs emissions during operation, South Coast AQMD staff recommends that the Lead Agency incorporate the following mitigation measures in the Final EIR.

¹ Draft EIR. Chapter 3. Project Description. "3.4.1 Construction Duration" Page 31.

² *Ibid.*

³ Draft EIR. Chapter 3. Project Description. "3.5.5 Operational Emissions Summary" Page 35.

⁴ South Coast AQMD. Rule 1113 – Architectural Coatings. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf>.

⁵ Draft EIR. Chapter 3. Project Description. "3.5.5 Operational Emissions Summary" Page 35.

1. Use of water-based or low VOCs cleaning products that go beyond the requirements of South Coast AQMD Rule 1113.
2. Require the use of electric landscaping equipment, such as lawn mowers and leaf blowers. South Coast AQMD's Commercial Electric Lawn and Garden Equipment Incentive and Exchange Program⁶ (Program) provides funds to accelerate the replacement of gasoline-powered commercial lawn and garden equipment for commercial landscapers and gardeners operating within the South Coast AQMD region and should be used to support the implementation of this recommended mitigation measures. The Lead Agency should include the information about the Program in the Final EIR and encourage commercial landscapers and gardeners to apply for funds from the Program.

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 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 the Proposed Project. Further, if the Lead Agency makes the finding that the recommended additional mitigation measures are not feasible, the Lead Agency should describe the specific reasons supported by substantial evidence for rejecting them in the Final 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 Margaret Isied, Assistant Air Quality Specialist, at misied@aqmd.gov or (909) 396-2543, 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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⁶ South Coast AQMD. Electric Lawn and Garden Equipment. Accessed at: <http://www.aqmd.gov/home/programs/community/community-detail?title=lawn-equipment>.