



South Coast Air Quality Management District

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Notice of Intent to Adopt a Mitigated Negative Declaration (MND) for the Senior Community Housing Project

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the MND. The aforementioned document was originally circulated on July 31, 2008, and in accordance with 15073.5 of the California Environmental Quality Act (CEQA) Guidelines the lead agency re-circulated the MND on October 22, 2008. The re-circulated document includes a revised air quality analysis providing a more accurate analysis on the regional air quality impacts and a quantitative air quality analysis on localized air quality impacts with new PM mitigation measures to reduce any potential air quality impacts from the project. Based on the revised analysis in the re-circulated MND, the SCAQMD staff concurs with the conclusion that with implementation of enforceable mitigation measures localized impacts are expected to be less than significant.

SCAQMD staff has worked cooperatively to address concerns raised in the SCAQMD staff's October 3, 2008 letter on the original MND. The primary concern for the proposed project is the potential fugitive dust emissions from the excavation activities. SCAQMD staff's review focused on the air quality analysis and mitigation measures in light of the proposed project's location adjacent to or near sensitive receptors such as schools. To ensure that the sensitive receptors surrounding the proposed site are not significantly impacted by the proposed project, enforceable commitment to implement mitigation measures identified in the re-circulated MND are critical.

SCAQMD staff offers the following technical comments to the air quality analysis and to strengthen mitigation measures proposed by the lead agency. The SCAQMD staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Dan Garcia, Air Quality Specialist – CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,

Steve Smith
Program Supervisor – CEQA Section
Planning, Rule Development & Area Sources

Attachment

SS:DG

LAC0 801022-07
Control Number

Air Quality Analysis -Construction Emissions

1. Upon review of the lead agency's URBEMIS 2007 input and output files SCAQMD staff found that the lead agency failed to activate its proposed mitigation measures for the mass grading phase of the URBEMIS2007 input files. Consequently, the lead agency's URBEMIS 2007 output files do not show the emissions reduced from implementing these mitigation measures. SCAQMD staff re-modeled the construction phase of the project to include all the mitigation measures proposed by the lead agency and determined that incorporation of these measures would result in less than significant impacts when compared to the SCAQMD's recommended Localized Significance Thresholds (LSTs).
2. SCAQMD staff has reviewed the revised MND and the supporting air quality documentation (URBEMIS2007 files). Review of the air quality data shows that unmitigated NOx emissions exceed the SCAQMD's LST. However, the lead agency compared total construction NOx emissions, both onsite and offsite, to the NOx LST. The SCAQMD recommends when performing an LST analysis to compare only onsite emissions to the applicable LST. Excluding the offsite mobile source emissions results in NOx construction emissions that are less than the applicable NOx LST. The lead agency may wish to continue to impose the NOx mitigation measures listed on pages 25 and 26 of the MND to ensure that the NOx emissions remain less than the NOx LST.
3. Section IX of the re-circulated MND and the attached location map state that the proposed project site is less than 50 meters from schools and multifamily residential land uses. These uses have been identified by the California Air Resources Board as sensitive land uses.¹ It is important, therefore, that the MND include air quality mitigation measures that reduce any potential emissions from the project. SCAQMD staff recommends the following additional mitigation measures.

PM Mitigation Measures:

- Minimize queuing of truck traffic in or near residential areas, and require haul trucks to adhere to the state law prohibiting heavy-duty trucks from idling five minutes or more, and
 - Provide outreach to nearby residents and schools as to when construction activity will occur.
4. Review of the URBEMIS2007 output sheets in Attachment E of the re-circulated MND indicates that the lead agency used a trip rate of 1.41 to determine the total daily trips and associated mobile source emissions during project operation, resulting in 91.65 trip ends per day. Review of the traffic analysis in Attachment G indicates that the trip rate used for weekdays is 2.66, resulting in peak daily operational trip ends of 200. It appears that the vehicle emissions may have been underestimated. However, a revision of the URBEMIS 2007 inputs to correct this discrepancy and reflect the trip rate provided in the traffic analysis will not change the agency's conclusion that operational air quality impacts are less than significant.

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>