



South Coast
Air Quality Management District

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E-mailed: August 19, 2010
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**Review of the Draft Mitigated Negative Declaration (MND)
for the Hacienda Heights Community Plan Update Project**

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are intended to provide guidance to the lead agency and should be incorporated into the final CEQA document as appropriate.

AQMD staff is concerned that the lead agency failed to quantify criteria pollutant and greenhouse gas emissions from the proposed project. As a result, the lead agency may not have enough information to determine if air quality or greenhouse gas impacts are significant pursuant to Section 15064 of the CEQA Guidelines. Therefore, AQMD staff recommends that the lead agency revise the draft MND to present a more accurate description of potential air quality impacts. Further, AQMD staff is concerned about the potential localized air quality and health risk impacts from the land use changes proposed in the community plan update. As a result, AQMD staff requests that the lead agency adopt policies in the community plan update that strictly adhere to all applicable advisory recommendations for sensitive land uses provided in the California Air Resources Board's Air Quality and Land Use Handbook (CARB Handbook). Lastly, if the lead agency concludes that some air quality impacts are significant, enforceable mitigation measures that can reduce the magnitude of these impacts to a less than significant level must be included with the project if the lead agency uses a MND to satisfy CEQA requirements.

Pursuant to Public Resources Code Section 21092.5, please provide the AQMD with written responses to all comments contained herein prior to the adoption of the final CEQA document. Further, staff is available to work with the lead agency to address these issues and any other air quality 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,

A handwritten signature in black ink that reads "Ian V. MacMillan". The signature is written in a cursive style with a large initial "I".

Ian MacMillan
Program Supervisor, CEQA Inter-Governmental Review
Planning, Rule Development & Area Sources

Attachment

[IM:DG](#)

LAC100723-02
Control Number

Quantification of Air Quality Impacts

1. The lead agency did not quantify potentially significant adverse regional construction or operational air quality impacts from the proposed project. On page 16 of the draft MND the lead agency states that the project may increase traffic congestion and exceed the AQMD's thresholds of significance. Also, on page 17 and 18 of the draft MND the lead agency states that the proposed project will increase the total allowable units that can be developed within the Hacienda Heights Community by 848 units. Further, the lead agency indicates that goals and policies contained in the community plan update may offset the increase in air quality impacts caused by new development in the proposed project, however, the lead agency failed to quantify these air quality impacts and offsets. To adequately evaluate air quality impacts, it is necessary to quantify both construction and operational emissions and compare them to applicable significance thresholds. Since the lead agency failed to quantify construction and operational related air quality impacts they have not demonstrated that air quality impacts from the proposed project are insignificant.

AQMD staff requests that the lead agency identify all potential adverse air quality impacts that could occur from all phases of the project and all air pollutant sources related to the project in the final MND. Specifically, AQMD staff recommends the lead agency calculate air quality impacts from both construction (including demolition, if any) and operational activities. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings used for striping traffic lanes or any associated structures, off-road equipment and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, that is, sources that generate or attract vehicular trips should also be included in the analysis.

As discussed in a phone call between lead agency staff and AQMD staff, all proposed new land uses should be evaluated in the revised CEQA document. This could include new housing in some areas, reduced housing in other areas, and incremental changes in areas where a previously designated land use (e.g., residential) is replaced by another use (e.g., school).

The AQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The AQMD recommends that the lead agency use this Handbook as guidance when preparing its revised draft or final air quality analysis. Copies of the Handbook are available from the AQMD's Subscription Services Department by calling (909) 396-3720. Additionally, the lead agency may be able to use other resources such as the URBEMIS 2007 Model (www.urbemis.com), or the California Climate Action Registry General Reporting Protocol Version 3.1 available at: www.climateregistry.org.

Siting Criteria and Future Project Planning

2. The proposed project is a community plan update that proposes numerous land use changes. The AQMD staff recognizes the proposed project may provide localized air quality benefits by implementing specific goals and policies that guide future development, for example, LU 5.1-Locate new uses with hazardous emissions away from existing sensitive receptors, including but not limited to housing and schools. Further, AQMD staff recognizes that some of these land uses are non-conforming uses that will be updated with the proposed project. However, some of these land use changes may allow increased residential uses in close proximity to commercial uses and the 60 Freeway. This future juxtaposition may expose local residents to potentially significant sources of emissions. Therefore, AQMD staff requests that the lead agency reduce future potential project related localized and health impacts by adopting policies in the community plan update that strictly adhere to all applicable advisory recommendations for sensitive land uses provided in the CARB Handbook (available at: <http://www.arb.ca.gov/ch/landuse.htm>).

3. Greenhouse Gas Emissions

Based on the description provided on page 18 of the draft MND, the proposed project may increase the number of building units in the Hacienda Heights Community by 848 units above what is approved in the current community plan. However, the lead agency did not quantify the potential greenhouse gas emissions from the proposed project in the draft MND. Without quantifying greenhouse gas emissions from the proposed project it is not clear that the draft MND complies with CEQA Guidelines 15064.4.

The California Attorney General's Office has entered into a number of lawsuits and settlements with lead agencies because they failed to analyze greenhouse gas emissions, failed to make a determination of significance (absence of a significance threshold does not relieve the lead agency of the obligation to make a significance determination), and/or failed to provide sufficient greenhouse gas mitigation measures. Therefore, AQMD staff requests that the lead agency revise the draft MND to include a quantitative analysis of greenhouse gases, a determination of significance, and if necessary, feasible mitigation measures.

4. Air Quality Mitigation

In the event that the lead agency's revised draft or final air quality analysis requested in comment #1 demonstrates that any criteria pollutant emissions from the regional construction or operational emissions analysis create significant adverse impacts CEQA Sections 15070 and 15073.5 require that the lead agency identify and commit to mitigation measures that will reduce these impacts to a less than significant level and that the MND be re-circulated prior to its certification.

To assist the lead agency with identifying possible mitigation measures for the project, please refer to Chapter 11 of the AQMD CEQA Air Quality Handbook for sample air quality mitigation measures. A list of mitigation measures can also be

found on the AQMD's CEQA webpage at the following internet address:

www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.htm

Additionally, AQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook contain numerous measures for controlling construction-related emissions that should be considered for use as CEQA mitigation if not otherwise required.