



South Coast  
Air Quality Management District

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FAXED: January 28, 2010

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Mr. Gregg McClain  
City of Hawthorne  
Planning and Community Development Department  
4455 West 126<sup>th</sup> Street  
Hawthorne, CA 90250

**Review of the Draft Environmental Impact Report (Draft EIR) for the  
Mixed Use Overlay and R-4, Maximum Density, Zone City of Hawthorne**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The following comment is intended to provide guidance to the lead agency and should be incorporated into the revised Draft or Final Environmental Impact Report (Draft or Final EIR) as appropriate.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. Further, 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,

A handwritten signature in black ink that reads "Ian V. MacMillan".

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

Attachment

IM:DG

LAC091217-01  
Control Number

Air Quality Analysis and Mitigation Measures:

1. The proposed project includes changes in land use designations for selected areas from industrial to commercial uses and from commercial to medium density residential uses. These proposed changes in land use designations will require some parcels to be rezoned; however, the lead agency fails to include an existing land use designation and zoning map in the Draft EIR. As a result, the SCAQMD staff cannot fully evaluate all potentially significant air quality impacts from the proposed project. Therefore, the SCAQMD staff requests that the lead agency provide a map identifying all existing land use and zoning designations.
2. The SCAQMD staff recognizes regional air quality benefits of the proposed project such as filling in urban cores and providing higher density residential zoning in close proximity to public transit. However, some of the proposed changes place residential uses in close proximity or adjacent to heavy industrial uses. For example, according to figure two on page eight the lead agency proposes a high density residential (R-4) zone adjacent to a manufacturing (M-1) zone. This type of zoning change may expose local residents to potentially significant sources of emissions. Therefore, the SCAQMD staff strongly recommends that the lead agency review the California Air Resources Board's Air Quality and Land Use Handbook: A Community Perspective, which is available at the following internet address: <http://www.arb.ca.gov/ch/handbook.pdf>. Specifically, the CARB Land Use Handbook offers guidance on siting incompatible land uses and addresses "sensitive land uses" (e.g., residences, parks and medical facilities) near industrial sources, high traffic freeways and roads. CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process.
3. On page 65 of the Draft EIR the lead agency summarized the proposed project's unmitigated regional construction air quality impacts (Table 14-Estimated Peak Daily Criteria Air Pollutant Emissions from Construction); however, the lead agency did not quantify the project's mitigated emissions value or make a significance determination for regional construction-related impacts. Also, on pages 67 and 68 of the Draft EIR the lead agency proposes a list of measures to mitigate the project's estimated emissions; however, the lead agency does not quantify the emissions reduced from these measures or disclose the residual impacts. As a result, the Draft EIR fails to provide the overall air quality impacts from the construction phase of the project. Therefore, SCAQMD staff requests that the lead agency calculate the project's mitigated regional construction-related emissions and make a significance determination for the project's regional construction-related air quality impacts in the revised Draft EIR or Final EIR.
4. The lead agency quantified potentially significant adverse operational air quality impacts from the proposed project by using an available mass input value for vehicle trips of 10,560 trips per day (i.e., 8,676 trips per day for additional residential units and 1,884 trips per day for additional commercial space) into the URBEMIS2007 Model. However, the lead agency does not properly account for area source emissions from the proposed project, because, it fails to input the correct number of additional housing units and commercial space into the URBEMIS2007 Model that is

required for the project. Specifically, the lead agency inputs a numerical value of one to characterize the project's total number of dwelling units and general commercial space per 1,000 square feet. While this value is sufficient for quantifying vehicle emissions it does not account for emissions from other area sources (i.e., landscape equipment, boilers, etc.) contributed by the additional 833 dwelling units and 157,000 square feet of commercial space that is supported by the proposed project. As a result, the URBEMIS2007 Model output values summarized in Table 4 (Air Pollutant Emissions) of the Draft EIR may be underestimated.

To adequately evaluate operational air quality impacts, it is necessary to quantify all operational emissions and compare them to applicable significance thresholds. Therefore, the SCAQMD staff recommends that the lead agency revise the calculations for operation-related air quality impacts from all area sources (e.g., boilers, landscape equipment, etc.) for the revised Draft EIR or Final EIR. Also, SCAQMD staff requests that the lead agency explicitly state and discuss all assumptions used for any URBEMIS2007 Model input value.

In the event that the lead agency's revised Draft EIR or Final EIR demonstrates that any criteria pollutant emissions from the regional emissions analysis create significant adverse impacts the SCAQMD recommends that the lead agency require mitigation pursuant to CEQA Guidelines §15370, which could minimize or eliminate significant adverse air quality impacts. To assist the lead agency with identifying possible mitigation measures for the project, please refer to SCAQMD's CEQA webpage at the following internet address:

[www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.htm](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.htm)

5. Given the position of the legislature on AB32, which states that global warming poses serious threats to the environment, the position of the California Attorney General's Office on global climate change, and the draft guidelines from the Office of Planning and Research it is incumbent on the lead agency to fully evaluate greenhouse gas (GHG) emissions from proposed project. In Section 5.0 of the Draft EIR the lead agency reports a daily CO<sub>2</sub> equivalent emissions value of 32,666 pounds per day, however, in the URBEMIS2007 Model output sheets available in Appendix B of the Draft EIR the total CO<sub>2</sub> emissions reported are 90,997 pounds per day. The SCAQMD staff requests that the lead agency explain the discrepancy between the two CO<sub>2</sub> emissions values mentioned above and provide the methodology used to calculate the project's GHG emissions in the revised Draft EIR or Final EIR.