



South Coast Air Quality Management District

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Review of the Re-circulated Draft Environmental Impact Report (Draft EIR) for the Santa Clarita Valley Area Plan Update

The South Coast Air Quality Management District (AQMD) 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 final Environmental Impact Report (final EIR) as appropriate.

Based on a review of the draft EIR the AQMD staff is concerned about the project's operational air quality impacts. Specifically, the lead agency has determined that the project's operational phase will exceed the AQMD's CEQA significance thresholds resulting in significant regional and cumulative air quality impacts. The project's operational air quality impacts are primarily from mobile source emissions related to the significant increase of vehicle trips (>1.8 million) associated with the proposed project. AQMD staff appreciates that this plan update, in conjunction with the Santa Clarita City General Plan update, encourages more dense development in already developed areas in Santa Clarita in order to reduce transportation and related air quality impacts. However, the lead agency has not stipulated specific measures or targets to reduce the large increase in mobile source emissions allowed under the proposed project. For example, the Southern California Association of Governments (SCAG) has adopted regional greenhouse gas (GHG) emission reduction targets under SB 375 of 8% by 2020 and 13% 2035. A reduction in GHGs will very likely provide co-benefits by reducing criteria pollutant emissions. Therefore, the AQMD staff recommends that the lead agency include quantitative targets and/or performance standards for the development of this plan in order to minimize the project's significant air quality impacts. Potential quantifiable mitigation measures are included in the greenhouse gas quantification report¹ published by the California Air Pollution Control Officer's Association in the final EIR.

¹ California Air Pollution Control Officer's Association. August 2010. Quantifying Greenhouse Gas Mitigation Measures. Accessed at: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

Further, the AQMD staff is concerned about the potential health risk impacts to future sensitive receptors (i.e., schools, school yards, parks, playgrounds, day care centers, nursing homes, hospitals, and residential communities) from potential sources of toxic emissions within the project boundaries. For example, Figure 3.1-2 and 3.1-3 in the draft EIR indicates that residential uses will be located adjacent to light industrial uses. Therefore, the AQMD staff recommends that the lead agency include mitigation in the final EIR that is consistent with the advisory recommendations listed in Table 1-1 of the Air Quality and Land Use Handbook² developed by the California Air Resources Board. Further, the AQMD staff requests that the lead agency include mitigation in the final EIR that requires any future project with sensitive land uses located in close proximity to an industrial use (i.e., source of toxic pollutants) to conduct a health risk assessment.

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 EIR. Further, staff is available to work with the lead agency to address these issues and any other questions regarding air quality 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,



Ian MacMillan

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

Attachment

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² 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>