



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178

(909) 396-2000 • www.aqmd.gov

E-Mailed: May 3, 2013
Ldahl@cityofpasadena.net

May 3, 2013

Ms. Laura Dahl
Planning and Community Development Department
175 N. Garfield Avenue
Pasadena, CA 91109

Review of the Draft Environmental Impact Report (Draft EIR) for the Lincoln Avenue Specific Plan Project

The South Coast Air Quality Management District (SCAQMD) staff 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 Environmental Impact Report (Final EIR) as appropriate.

Based on a review of the Draft EIR the SCAQMD staff recognizes the potential regional air quality benefits from projects that facilitate mixed land uses. However, given the potential significant health risk impacts from placing additional residents within close proximity to the 210 Freeway (a significant source of Toxic Air Contaminants) the lead agency should clarify details regarding the mitigation of these impacts. Further, SCAQMD staff recommends that the lead agency consider additional mitigation measures to minimize the project's significant regional construction and operations-related air quality impacts pursuant to Section 15126.4 of the California Environmental Quality Act (CEQA) Guidelines. Details regarding these comments are attached to this letter.

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". The signature is written in a cursive, slightly slanted style.

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

Attachment

IM:DG

LAC130322-01
Control Number

Localized Air Quality Impacts

1. The proposed project will allow new residential units to be placed in close proximity to the 210 Freeway that currently carries about 130,000 vehicles per day. As a result, the lead agency determined that the project's sensitive land uses will be exposed to elevated levels of Toxic Air Contaminant's resulting in a significant health risk impacts (i.e., Impact 5.2-6). Therefore, the lead agency incorporated mitigation measure 2-6 (enhanced filtration in building's ventilation system) in the Draft EIR and concluded that mitigation measure 2-6 will reduce this impact to a less than significant level. However, the lead agency does not specify how incorporation of mitigation measure 2-6 will ensure less than significant health risk impacts; for example, the lead agency does not require filters with a specific efficiency rating or discuss how external factors such as exposure due to air flow from operable windows will be addressed. Therefore, the SCAQMD staff recommends that the lead agency provide additional information regarding the plan to ensure that mitigation measure 2-6 reduces localized health risk impacts to insignificant levels. Also, the lead agency should discuss how future localized air quality impacts (i.e., ambient air quality standards) will be addressed as traffic volumes change on the 210 Freeway. Further, the Final EIR should consider enhancing mitigation measure 2-6 by including the following requirements:
 - a. Placing air intakes as far from the freeway as possible,
 - b. Limiting the use of operable windows and/or balconies on portions of the site closest to the freeway, and
 - c. Consider maintaining positive pressure with the building's filtered ventilation system in living spaces to reduce infiltration of unfiltered outdoor air.

Lastly, the lead agency should discuss what will happen if a future project's analysis shows that filters cannot bring pollutant levels below threshold.

Operational Mitigation Measures

2. Given that the lead agency determined that the proposed project will exceed the CEQA regional operational significance thresholds for NO_x, VOC's, CO and PM₁₀ the SCAQMD staff recommends that the lead agency provide the following additional mitigation measures pursuant to CEQA Guidelines Section 15126.4.

Transportation

- a. Require electric car charging stations (not just wiring infrastructure) for both non-residential and residential uses at the project site.
- b. Create or participate in a local "light vehicle" network, such as neighborhood electric vehicle (NEV) systems.

Energy

- c. Require the project site to include a solar photovoltaic or an alternate system with means of generating renewable electricity.

Other

- d. Provide outlets for electric and propane barbecues in residential areas.

- e. Require use of electric lawn mowers and leaf blowers.
- f. Require use of electric or alternatively fueled sweepers with HEPA filters.
- g. Require use of water-based or low VOC cleaning products.

Construction Equipment Mitigation Measures

3. The lead agency determined that the proposed project will exceed the CEQA construction significance threshold regionally for NO_x and VOC's; therefore, SCAQMD staff recommends that the lead agency provide the following additional mitigation measure pursuant to CEQA Guidelines Section 15126.4.
 - Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export) and if the lead agency determines that 2010 model year or newer diesel trucks cannot be obtained the lead agency shall use trucks that meet EPA 2007 model year NO_x emissions requirements.