



South Coast Air Quality Management District

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**Review of the Precise Plan and Mitigated Negative Declaration
for the Proposed Construction of a New Mixed-Use Development at
808 West Garvey Avenue**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the final precise plan and mitigated negative declaration (MND) as appropriate.

Summary of Comments

The air quality analysis underestimates potential impacts during construction because an adjustment was made to correct a software error from a previous version of CalEEMod. Because a newer version of CalEEMod was used for this Draft MND, the adjustment results in an incorrect lowering of emissions that does not match the current description of construction activities. By using the correctly reported values from CalEEMod, it appears that construction emissions would exceed the SCAQMD significance emission thresholds for NO_x, PM₁₀ and PM_{2.5}. Since potential significant impacts may arise from combustion emissions related to haul truck activities, mitigation should be considered, such as extending the grading/hauling phase and/or requiring the use of 2010 model year or newer haul trucks. Details regarding these and other comments can be found in the attachment.

SCAQMD Contact Information

Pursuant to Public Resources Code Section 21092.5, SCAQMD staff requests that the Lead Agency provide the SCAQMD with notice of any public hearings herein prior to the adoption of the Final MND. Further, staff is available to work with the Lead Agency to

address these issues and any other questions that may arise. Please contact James Koizumi, Air Quality Specialist CEQA Section, at (909) 396-3234, if you have any questions regarding the enclosed comments.

Sincerely,



Ian MacMillan

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

IM:JK

attachment

LAC140130-01
Control Number

Construction Emissions Analysis

Based on the project description (see page 6 of the Initial Study) the project requires 42,000 cubic yards of soil to be removed during construction. Table 3 – Tentative Construction Schedule (see page 44 of the Initial Study) shows that the grading phase would occur over four days. The Initial Study states that an estimate of 1,312 total haul trips per day for grading was used because of a programming error in CalEEMod (see page 44). This estimate can be seen in the Trips and VMT table in the CalEEMod output file in Appendix A of the Initial Study. The error reported in the Initial Study occurred in an older version of CalEEMod. However, this error was corrected in the current version of CalEEMod (CalEEMod.2013.2.2), which was used to estimate emissions in the Initial Study. Therefore, use of the correction in the new model results in an underestimate of emissions. By using the correctly reported values from CalEEMod, it appears that NOx construction emissions would exceed the SCAQMD regional significance emission thresholds of 100 pounds of NOx per day and the localized significance emissions threshold of 108 pounds of NOx per day. The PM10 and PM2.5 emissions would also exceed the localized significance emissions thresholds.

Idling Emission Factor Adjustments During Operations

The Draft MND states that NOx emissions are adjusted in CalEEMod, because CalEEMod does not account for the five-minute idling restrictions required by State law (see page 45). The output file from CalEEMod in Appendix A of the Initial Study also shows adjustments to emission factors for heavy-duty diesel truck (HDD), light-heavy-duty truck (LHD2), medium-heavy duty diesel truck (MHD), other bus (OBUS), and school bus (SBUS) categories. This is incorrect. As a default, CalEEMod already calculates five minutes of idling for each truck trip. Therefore, the idling emission factors should not be adjusted without further justification and no adjustments should be made to regional criteria emissions estimated in CalEEMod.

Trip Rate Adjustment for Mixed Land Use

Trip reductions for mixed uses appear to follow an ad-hoc approach that does not follow the trip reduction guidance set forth by CAPCOA in its Quantifying Greenhouse Gas Mitigation Measures document dated August 2010 (<http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>). Therefore, the Final MND should include further justification for allowing the trip reductions presented in the Initial Study or use the CAPCOA measures identified above that are incorporated into CalEEMod's mitigation features.

Localized Air Quality Impacts

The Draft MND only analyzed localized impacts from CO emission. In addition to analyzing CO localized air quality impacts, the SCAQMD staff recommends calculating localized air quality impacts from NOx, PM10 and PM2.5 and comparing the results to localized significance thresholds (LSTs). LST's can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when revising the air quality analysis for the proposed project, it is recommended that the lead agency perform a localized analysis by either using the LSTs developed by the SCAQMD or performing

dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>.

Mitigation Measures

In the event that the Lead Agency determines the project will have significant air quality impacts, the SCAQMD staff recommends that the Lead Agency provide additional mitigation measures to minimize such impacts pursuant to Section 15126.4 of the California Environmental Quality Act (CEQA) Guidelines. A list of potential construction-related air quality mitigation measures is available at:

http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html

Since potential significant impacts may arise from combustion emissions related to haul truck activities, the most effective mitigation would be to extend the grading/hauling phase and/or to require the use of 2010 model year or newer haul trucks.

Mitigation measures were used in CalEEMod to reduce emissions that were not enumerated in the Draft MND (i.e., no wood burning fire places and energy efficient dishwashers). Any mitigation used to reduce emissions should be made a condition of the proposed project in the Draft MND.