



South Coast Air Quality Management District

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Mr. Alex Hamilton, Director
Planning and Community Development
City of Montebello
1600 W. Beverly Boulevard
Montebello, CA 90640

Recirculated Draft Environmental Impact Report (RDEIR) for the Proposed Montebello Hills Specific Plan Project (SCH NO. 2008011122)

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned RDEIR. Further, the SCAQMD staff incorporates by reference applicable portions of its previous letter dated June 12, 2009. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final CEQA document.

In the RDEIR, the Lead Agency included analyses of three additional potentially feasible alternatives. These three alternatives are in addition to the five alternatives¹ studied in the previous DEIR that was circulated in 2008. The three proposed added alternatives include: Alternative 6) 1,200 dwelling units; Alternative 7) 1,200 dwelling units and 87,000 square feet of commercial uses; and Alternative 8) 1,088 dwelling units and 87,000 square feet commercial. In addition, adjacent on- and off-ramps near the project site are expected to be impacted by the proposed project. Finally, mitigation measures that affect areas including air quality and traffic were modified or added to the proposed project. Project construction will occur sequentially beginning in late 2016 to early 2017 with project build-out occurring in 2022.

The SCAQMD staff reaffirms our previous comment concerns² that residents and other sensitive receptors in the proposed mixed-use alternatives would still be exposed to borderline significant levels of cancer risk and significant regional NO_x emissions during construction. In addition, the proposed project will generate significant operational CO, NO_x and ROG emissions from commercial and residential vehicles along with emissions from the active oil field that continues to operate 24 hours per day, seven days per week around/surrounding the proposed development. Further, the SCAQMD staff has concerns about the air quality modeling assumptions used to estimate localized air quality

¹ 2008 DEIR Alternative 1) No Project/No Build; Alt 2) Existing General Plan Build-Out – 3,946 Dwelling Units; Alt 3) 800 Dwelling Units; Alt 4) 600 Dwelling Units; and Alt 5) Mixed Use Plan – 600 Dwelling Units and 92,000 Square Feet of Commercial.

² SCAQMD Staff Comment Letter Dated June 12, 2009 – Cover Letter, Paragraph 2.

and health risk effect impacts in support of the Lead Agency's determination that these impacts are less than significant. Finally, the SCAQMD staff recommends that all feasible mitigation measures should be incorporated into the proposed project and Final EIR.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD staff with written responses to all comments contained herein prior to the adoption of the Final Environmental Impact Report. The SCAQMD staff is available to work with the Lead Agency to address these issues and any other air quality questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

Jillian Baker

Jillian Baker, Ph.D.
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Planning, Rule Development & Area Sources

Attachment

JB:GM

LAC140911-01
Control Number

Air Quality Analyses Modeling

Localized Significance Thresholds (LST) and Health Risk Assessment (HRA)

1. As of December 9, 2006, AERMOD is fully promulgated as a replacement to ISC3, in accordance with [Appendix W](#). Therefore, SCAQMD staff recommends that the Lead Agency update the dispersion modeling performed for the LST and HRA using the latest version of AERMOD (http://www.epa.gov/ttn/scram/dispersion_prefrec.htm#aermod) and the latest meteorological data (<http://www.aqmd.gov/home/library/air-quality-data-studies/meteorological-data/data-for-aermod>).
2. The Air Quality section references a HRA performed for the future residents of the project based on the on-going oil field operations on the site. This HRA was first mentioned in the DEIR and the cancer risk to future residents of the proposed project will be 9.9 in one million from the on-going oil and gas exploration activities, which is less than the SCAQMD's threshold of 10 in one million. SCAQMD staff raised an issue with the way the modeling was performed in its previous comments.³ In the RDEIR, the Lead Agency did not address this previous comment and continues to reference the older HRA in the RDEIR. Therefore, the SCAQMD staff recommends that the Lead Agency update the health risk analysis to the future residents living in the project area by revising the HRA to demonstrate that health effects are less than significant. Otherwise, health risk impacts to future residents may be underestimated.
3. Industrial Source Complex (ISC) OLM was used to estimate the project's localized impacts from NO_x. However, given the complexities with the way air dispersion models convert NO_x to NO₂, and that the US EPA has fully promulgated AERMOD as the replacement to ISC, SCAQMD staff recommends that AERMOD be used to determine the project's localized impacts.
4. The RDEIR and Appendix E do not contain sufficient information for SCAQMD staff to determine how the emissions were calculated for each source modeled for both the LST and the HRA. The Final EIR should provide more detailed information, such as sample calculations showing how the project's impacts were estimated and sample calculations showing how the emissions from CalEEMod and/or EMFAC were used to determine the emission rates of the sources modeled. Without these details, it is not possible to review the Air Quality impacts stated in the RDEIR for accuracy. The Lead Agency has therefore not demonstrated that localized or health risk impacts are less than significant.

Operational Mitigation Measures

³ Ibid. 2, Comment No. 6.

5. Because the Lead Agency has determined that the proposed project will exceed the regional and localized operational significance thresholds for VOC and NO_x, the SCAQMD staff recommends that the lead agency provide the following additional mitigation measures pursuant to CEQA Guidelines Section 15126.4.

Transportation

- Make a commitment to install electric car charging stations (not just wiring infrastructure) for both non-residential and residential uses at the project site.
- Create local “light vehicle” networks, such as neighborhood electric vehicle (NEV) systems.

Energy

- Make a commitment that the project site will include a solar photovoltaic or an alternate system with means of generating renewable electricity.

Other

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