



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Negative Declaration (ND) for the Proposed Downtown Bellflower Transit Oriented Development Specific Plan (GPA 19-02)

The South Coast Air Quality Management District (South Coast AQMD) 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 ND.

South Coast AQMD Staff's Summary of Project Description

The Lead Agency proposes to develop amendments to land use and zoning designations to guide and promote transit-supportive land uses on 400 acres in anticipation of the forthcoming Bellflower high-speed, Eco-Rapid station at the Bellflower Boulevard on the western edge of downtown Bellflower (Proposed Project). Specifically, the Lead Agency will, among others, amend land use designations within the Proposed Project from Commercial, High Density Residential, Medium Density Residential, and Low Density Residential to Mixed-Use. The Proposed Project will consist of a Land Use Plan, Development Standards, a Mobility Plan, an Infrastructure Plan, Design Guidelines, and an Administrative/Implementation Plan.

South Coast AQMD Staff's Summary of Air Quality Analysis

In the Air Quality Analysis Section, the Lead Agency did not quantify the Proposed Project's construction or operational emissions because "there is no actual, physical development being proposed, nor are any new construction, grading, or other physical alterations to the environmental being considered¹." The Lead Agency also stated that "future residential and non-residential uses within the [Proposed Project] will not result in any potential air quality impacts²." Additionally, the Lead Agency incorporated by reference previous CEQA analyses for projects within the Proposed Project to support that future projects implementing the Proposed Project will not result in significant air quality impacts³.

South Coast AQMD Staff's Comments

The Lead Agency did not quantify the Proposed Project's construction (regional and localized) and operational emissions or include those emissions in the ND to support the less than significant findings. Construction of residential and non-residential uses will likely result in emissions from including, but not limited to, the use of heavy-duty construction equipment. Operation will result in emissions from stationary sources such as boilers and tailpipe emissions from mobile sources traveling to and from residential and non-residential uses.

One of the basic purposes of CEQA is to inform government decision makers and the public about the potential, significant environmental effects of proposed activities (CEQA Guidelines Section 15002(a)(1)). A negative declaration is appropriate when the Lead Agency finds that the project will not

¹ ND, Page. 23.

² *Ibid.* Page. 24.

³ *Ibid.*

have a significant effect on the environment (CEQA Guidelines Sections 15070 to 15075). Reasons to support this finding shall be documented in the initial study. Without quantifying emissions from construction and operational activities, the ND has not made that documentation which serves as substantial evidence to support a fair argument that the Proposed Project would not have any adverse effects on air quality. Therefore, South Coast AQMD staff recommends that the Lead Agency use its best efforts to quantify and disclose the Proposed Project's air quality impacts as a result of future construction and operational activities of subsequent residential and non-residential projects implementing the Proposed Project in the Final ND.

The following comments are meant as guidance to assist the Lead Agency's quantifications of the Proposed Project's construction and operational emissions in the Final ND.

South Coast AQMD Air Quality CEQA Thresholds of Significance

South Coast AQMD has also developed both regional and localized air quality significance thresholds. South Coast AQMD staff requests that the Lead Agency compare the emissions to the recommended regional significance thresholds found here: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>. In addition to analyzing regional air quality impacts, South Coast AQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LSTs 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 preparing 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 South Coast AQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

Quantitative Air Quality Impact Analysis

When specific development is reasonably foreseeable as result of the goals, policies, and guidelines in the Proposed Project, the Lead Agency should identify any potential adverse air quality impacts and sources of air pollution that could occur using its best efforts to find out and a good-faith effort at full disclosure in the EIR. The degree of specificity will correspond to the degree of specificity involved in the underlying activity which is described in the EIR (CEQA Guidelines Section 15146). When quantifying air quality emissions, emissions from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis. Furthermore, for phased projects where there will be an overlap between construction and operation, the emissions from the overlapping construction and operational activities should be combined and compared to South Coast AQMD's regional air quality CEQA *operational* thresholds to determine the level of significance.

Additional Guidance on Air Quality Analysis

South Coast AQMD staff recognizes that there are many factors Lead Agencies must consider when making local planning and land use decisions. To facilitate stronger collaboration between Lead Agencies and South Coast AQMD to reduce community exposure to source-specific and cumulative air pollution impacts, South Coast AQMD adopted the Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning in 2005. This Guidance Document provides suggested policies that

local governments can use in their General Plans or through local planning to prevent or reduce potential air pollution impacts and protect public health. South Coast AQMD staff recommends that the Lead Agency review this Guidance Document as a tool when making local planning and land use decisions. This Guidance Document is available on South Coast AQMD's website at: <http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf>. Additional guidance on siting incompatible land uses (such as placing homes near freeways or other polluting sources) can be found in the California Air Resources Board's *Air Quality and Land Use Handbook: A Community Health Perspective*, which can be found at: <http://www.arb.ca.gov/ch/handbook.pdf>. Guidance⁴ on strategies to reduce air pollution exposure near high-volume roadways can be found at: https://www.arb.ca.gov/ch/rd_technical_advisory_final.PDF.

California Emission Estimator Model (CalEEMod)

South Coast AQMD staff recommends that the Lead Agency estimate the Proposed Project's short- and long-term air quality impacts using the current version of California Emission Estimator Model (CalEEMod)⁵. This software is free of charge and incorporates up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. The Proposed Project's emissions can also be estimated by following the calculation methodologies in Chapter 9 and the Appendix to Chapter 9 in the South Coast South Coast AQMD's CEQA Air Quality Handbook⁶.

Mitigation Measures

In the event that the Lead Agency finds, after revisions to the Air Quality Analysis, that construction or operational emissions would exceed South Coast AQMD's air quality CEQA daily significance thresholds, feasible mitigation measures to minimize these impacts are required. Several resources are available to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project, including:

- Chapter 11 of South Coast AQMD's CEQA Air Quality Handbook.
- South Coast AQMD's CEQA web pages available here: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>.
- South Coast AQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions.
- South Coast AQMD's Mitigation Monitoring and Reporting Plan (MMRP) for the 2016 Air Quality Management Plan (2016 AQMP) available here (starting on page 86): <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf>.
- California Air Pollution Control Officers Association (CAPCOA)'s *Quantifying Greenhouse Gas Mitigation Measures* available here: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>.

⁴ In April 2017, CARB published a technical advisory, *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways: Technical Advisory*, to supplement CARB's Air Quality and Land Use Handbook: A Community Health Perspective. This technical advisory is intended to provide information on strategies to reduce exposures to traffic emissions near high-volume roadways to assist land use planning and decision-making in order to protect public health and promote equity and environmental justice. The technical advisory is available at: <https://www.arb.ca.gov/ch/landuse.htm>.

⁵ South Coast AQMD. CalEEMOD (version 2016.3.2). Accessed at: <http://caleemod.com/>.

⁶ South Coast AQMD. Air Quality Analysis Guidance Handbook. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.

Conclusion

Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the ND for adoption together with any comments received during the public review process. Please provide South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final ND. When responding to issues raised in the comments, responses should provide sufficient details giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and the public who are interested in the Proposed Project. Further, if the Lead Agency makes a finding that additional recommended mitigation measures are not feasible, the Lead Agency should describe the specific reasons for rejecting or substituting these mitigation measures in the Final ND (CEQA Guidelines Section 15074.1).

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact me at lsun@aqmd.gov, should you have any questions.

Sincerely,

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Planning, Rule Development & Area Sources

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