



South Coast Air Quality Management District

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E-Mailed: October 29, 2013

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October 29, 2013

Mr. Patrick Prescott
City of Burbank
150 North Third Street
Burbank, California 91502

Review of the Draft Environmental Impact Report (Draft EIR) for the IKEA Retail Store Project

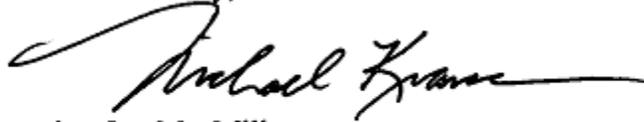
The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comment is intended to provide guidance to the Lead Agency and should be incorporated into the final environmental impact report (EIR) as appropriate.

The proposed project is located on a previous industrial land use site that contains residual soil and soil vapor contamination. As a result, the SCAQMD staff is concerned about the potential localized air quality impacts from soil disturbance activities required for construction of the proposed project. Therefore, the SCAQMD staff recommends that the Lead Agency update the localized air quality analysis to include revised modeling information based on the enclosed comments. Further, the SCAQMD staff is concerned about the significant regional operational air quality impacts from the proposed project. Specifically, the Lead Agency determined that the project will exceed the SCAQMD's CEQA regional significance thresholds for NO_x, CO and PM₁₀ emissions during operation of the project. Therefore, the SCAQMD staff recommends that pursuant to Section 15126.4 of the CEQA Guidelines the Lead Agency require the additional mitigation measures in the final EIR. Details regarding these comments are attached to this letter.

Pursuant to Public Resources Code Section 21092.5, SCAQMD staff requests that the Lead Agency 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, appearing to read "Michael K. MacMillan". The signature is fluid and cursive, with a long horizontal stroke at the end.

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

[MK:DG](#)

LAC130913-01
Control Number

Regional Operational Air Quality Impacts

1. The Lead Agency determined that the proposed project will exceed the CEQA regional operational significance thresholds for NO_x, CO and PM₁₀ emissions. Therefore, SCAQMD staff recommends that the Lead Agency provide the following additional mitigation measures pursuant to CEQA Guidelines Section 15126.4.

Additional Operational Mitigation Measures - Transportation

- a) Provide electric car charging stations for employees and customers. Also, provide designated areas for parking of zero emission vehicles (ZEVs) for car-sharing programs.
- b) Provide incentives to encourage public transportation and carpooling.
- c) Provide incentives for employees and the public to use public transportation such as discounted transit passes, reduced ticket prices at local events, and/or other incentives.
- d) Implement a rideshare program for employees.
- e) Create a local "light vehicle" networks, such as neighborhood electric vehicle (NEV) system.
- f) Require the use of 2010 compliant diesel trucks, or alternatively fueled, delivery trucks (e.g., food, retail and vendor supply delivery trucks) at commercial/retail sites upon project build-out. If this isn't feasible, consider other measures such as incentives, phase-in schedules for clean trucks, etc.

Additional Operational Mitigation Measures - Other

- g) Require use of electric lawn mowers and leaf blowers.
- h) Require use of electric or alternatively fueled sweepers with HEPA filters.

Localized Air Quality Analysis

2. An in-stack ratio (ISR) of NO₂/NO_x of 0.1 was used in the air dispersion modeling for NO_x. The June 28, 2010 memo from EPA (http://www.epa.gov/ttn/scram/guidance/clarification/ClarificationMemo_Appendix_W_Hourly-NO2-NAAQS_FINAL_06-28-2010.pdf) specifically states that "the 0.1 in-stack ratio often cited as the "default" ratio for OLM should not be treated as a default value for hourly NO₂ compliance demonstrations" In addition, EPA's guidance issued on March 1, 2011 (http://www.epa.gov/ttn/scram/guidance/clarification/Additional_Clarifications_AppendixW_Hourly-NO2-NAAQS_FINAL_03-01-2011.pdf) allowed for a default ISR of 0.5 in the absence of more appropriate source-specific information. A default ISR of 0.5 should be used in NO₂ modeling unless it can be demonstrated according to EPA methodology that another ISR value is appropriate.
3. The IKEA Home Furnishing Store Project Localized Significance Threshold Analysis, dated June 2013, in Appendix 5.2, states that the five years of available AERMOD meteorological data was reviewed to identify the calendar year which produced the highest pollutant concentrations. The appendix states that based on that

review, the 2009 data set was identified as producing the highest pollutant concentration. The meteorological data analysis does not appear to be included in the materials provided to the SCAQMD. This analysis should be included in the Final EIR or all five years of meteorological data should be used in the air dispersion modeling to demonstrate that the appropriate maximum concentrations were identified.