



# South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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**Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) for the  
Proposed Arcadia 17 Residential Condominium Project (CUP No. 14-2; Tentative  
Tract Map No. 72894; and MFADR 14-12)**

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 CEQA document.

### Project Description

In the Draft IS/MND (DMND), the Lead Agency proposes demolition of the existing business structures and construction of 17 condominium residences in three, 3-story buildings. In the project description and the air quality section, the proposed project includes demolition of at least three existing commercial buildings and a surface parking area but does not include the amount of debris tonnage, the number of total truck trips to remove the debris, or the hauling distances to the debris location site and its locations. The total site acreage and the amount of daily soil disturbance should also be included in the Final MND. The approximate size of the buildings should be described including any subterranean parking if applicable. If there is excavation involved, cut or fill activities, these activities should be discussed in sufficient detail in the Final MND and also be incorporated in the air quality emission estimates. This would include any soil exported from the site or imported, for example, to remediate any soil that shows contamination. The phases and applicable timelines should also be included in the Final MND.

### Documentation

In the Air Quality Section, the Lead Agency determined that project regional and localized air quality impacts were less than significant during construction and operational activities. The SCAQMD staff has concerns that these determinations were made without adequate documentation included in the DMND or the technical appendices that accompanied the draft CEQA document circulated for public review. On

pages six and seven of the DMND, the Lead Agency cites using the California Emissions Estimator Land Use Model (CalEEMod)<sup>1</sup> to estimate construction and operational emission impacts and cites comparing those estimates with the SCAQMD thresholds. Although discussed in the narration, the construction and operational estimates, significance thresholds for regional and localized impacts were not included in the DMND. It is also not clear how the localized emissions were estimated since ROG emissions are not estimated and the Lead Agency states that the proposed project will comply with “the majority” of the LST’s recommended. Guidance for evaluating localized impacts is located at the SCAQMD website.<sup>2</sup> At a minimum, the Final MND should include sufficient information to support these findings. For the regional and localized analyses, summary information could be included in a table, the narration or part of an appendix. The modeling output sheets could also be included as an attachment to an appendix. Otherwise, the Lead Agency has not provided adequate documentation to demonstrate that project short- and long-term air quality impacts are less than significant.

Should the Lead Agency conclude after further analyzes that construction or operational air quality impacts exceed the SCAQMD daily significance thresholds, staff has compiled mitigation measures<sup>3</sup> in addition to the mitigation included in the DMND starting on page six of the DMND to be implemented if the air quality impacts are determined to be significant.

#### SCAQMD Rules and Regulations

Since the project site includes previous land uses that may have impacted soils in the ground, the Lead Agency should cite SCAQMD Rule 1166 – Volatile Organic Compound Emissions From Decontamination of Soil if equipment will disturb the soils that contain hydrocarbon. In addition, Final MND should discuss Rule 402 – Nuisance from potential odors that could potentially come from the auto-body shop located next to the proposed site. Finally, the Final MND should discuss potential health risks to the proposed residents from the existing auto body shop since toxic air contaminants may be emitted from the on-going auto body shop operations.

Finally, it is recommended that the lead agency evaluate localized air quality impacts since it is noted on page eight in the Draft MND and in an aerial map inspection, the proposed project is located within one-quarter mile of sensitive receptors (multi-family and single-family residential properties) southeast and south of the proposed project. Therefore, the SCAQMD staff requests that the lead agency evaluate localized air quality impacts to ensure that any nearby sensitive receptors are not adversely affected by the construction activities that are occurring in close proximity. SCAQMD guidance for performing a localized air quality analysis can also be found at the SCAQMD website.

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<sup>1</sup> <http://www.aqmd.gov/ceqa/models.html>

<sup>2</sup> <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>

<sup>3</sup> [http://www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html)

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3

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Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final MND. The SCAQMD staff is available to work with the Lead Agency to address these issues and any other 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*

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JB:GM

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