



South Coast
Air Quality Management District

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SENT VIA E-MAIL AND USPS:

April 28th, 2015

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City of Glendora
Planning Department
116 East Foothill Blvd.
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Draft Mitigated Negative Declaration (Draft MND) for the Proposed Residential Dwelling Located at 255 S. Vermont Ave., Glendora CA 91741

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 IS/MND.

In the project description, the Lead Agency proposes to demolish a 22,184 square foot industrial building and construct 40 detached condominiums. Since the project includes demolition, the Lead Agency must comply with SCAQMD Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities. Please provide additional information regarding compliance with SCAQMD Rule 1403 in the Final IS/MND.

In its air quality analysis, the Lead Agency estimated project emission impacts using the URBEMIS2007 land use computer model. The SCAQMD staff no longer recommends using URBEMIS2007 to estimate project impacts. Instead, a more comprehensive land use model with updated mobile source emission rates is available, the California Emissions Estimator model (CalEEMod)¹. The current version of CalEEMod (Version 2013.2.2) uses the new EMFAC2011 and OFFROAD2011 emission factors rather than the outdated EMFAC2007 and OFFROAD2007 emission rates used in URBEMIS2007 and earlier versions of CalEEMod. In addition, CalEEMod provides updated methods and emission factors for non-vehicular sources. For a more current estimate, the SCAQMD staff therefore recommends revising the air quality analysis in the Final MND using the CalEEMod land use model.

The SCAQMD staff is available to work with the Lead Agency to address these concerns and any other air quality questions that may arise. Please contact Jack Cheng, Air Quality Specialist at (909) 396-2448, if you have any questions regarding these comments. We look forward to reviewing and providing comments for the Final IS/MND associated with this project.

Sincerely,

Jillian Wong

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Planning, Rule Development & Area Sources

JW:JC
LAC 150305-03
Control Number

¹ The current California Emission Estimator Model (CalEEMod) accessible at www.caleemod.com