



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Mitigated Negative Declaration (MND) for the Proposed The Ranch - Multi-Family Residential Community

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 MND.

SCAQMD Staff's Summary of Project Description and Air Quality Analysis

The Lead Agency proposes to demolish four existing buildings and build 324 residential units on 11.44 acres (Proposed Project). According to the Project Assumptions on Page 11 of the MND, the environmental analysis for the Proposed Project including the Air Quality Analysis was tiered from the Downtown Specific Plan (Specific Plan) MND. Since the Specific Plan's regional and localized air quality impacts were found to be less than significant or have been adequately addressed in the Specific Plan MND, and since the Proposed Project implements the Specific Plan, the Lead Agency found that the Proposed Project's construction and operational air quality impacts were less than significant.

SCAQMD Staff Comments

Tiering

The Air Quality Analysis for the Proposed Project was tiered from the Downtown Specific Plan MND and referenced the prior, broader environmental analyses as follows:

- "The Jefferson and Ivy Air Quality and Greenhouse Gas Emissions Impact Analysis report" on Page 23 of the MND;
- "Section 7.3" on Page 24 of the MND;
- "The data showed the on-going operation of the proposed project would not exceed the local NO_x, CO, PM₁₀ and PM_{2.5} thresholds of significance" on Page 25 of the MND.

Because the MND for the Proposed Project did not state where a copy of the above-listed environmental analyses may be examined, SCAQMD staff was not able to review or comment on completeness or adequacy of the Air Quality Analysis for the Proposed Project. "When tiering is used, the later EIRs or negative declarations shall refer to the prior EIR and state where a copy of the prior EIR may be examined. The later EIR or negative declaration should state that the lead agency is using the tiering concept and that it is being tiered with the earlier EIR" (CEQA Guidelines Section 15152(g)). To foster meaningful public participation and input, and informed decision making, SCAQMD staff recommends that the Lead Agency state where a copy of the prior environmental analyses may be examined or incorporate by reference all or applicable portions of the prior environmental analysis in the Final MND.

Compliance with SCAQMD Rule 1403

Since the Proposed Project will include demolition of four existing buildings, and in the event asbestos is encountered during demolition, SCAQMD staff recommends that the Lead Agency include a discussion to demonstrate compliance with SCAQMD Rule 1403 in the Final MND.

Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process. Please provide the SCAQMD with written responses to the comment contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, response 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 or useful to decision makers and the public who are interested in the Proposed Project.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

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