



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182  
(909) 396-2000 • www.aqmd.gov

**FAXED: AUGUST 24, 2005**

August 24, 2005

Mr. Jay Eastman  
City of Fullerton  
Development Services Department  
303 West Commonwealth Avenue  
Fullerton, CA 92832

Dear Mr. Eastman:

**Draft Mitigated Negative Declaration (DMND) for the  
Jacaranda Senior Apartments: August 2005**

The SCAQMD 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 in the Final Mitigated Negative Declaration.

Please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Mitigated Negative Declaration. The SCAQMD would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Charles Blankson, Ph.D., Air Quality Specialist – CEQA Section, at (909) 396-3304 if you have any questions regarding these comments.

Sincerely

Steve Smith, Ph. D.  
Program Supervisor, CEQA Section  
Planning, Rule Development & Area Sources

Attachment

SS:CB

ORCO50805-04  
Control Number

**Draft Mitigated Negative Declaration (DMND) for the  
Jacaranda Senior Apartments**

**Screening Tables:** On page 4 of the DMND, the lead agency concludes that “all construction related impacts are temporary, and though possibly adverse, they are not considered significant” based on the screening tables in Chapter 6 of the 1993 SCAQMD CEQA Air Quality Handbook (Handbook). The lead agency provides no data on the air quality impacts of the proposed projects.

Please note that although the screening tables in the Handbook were developed by the SCAQMD, the SCAQMD no longer supports the use of these tables. This is because the mobile source emission factors used in the tables are from an old version of the California Air Resources Board (CARB) EMFAC model. The current version is EMFAC 2002. Furthermore, the trip generation rates used in the screening tables are from an older version of the Institute of Transportation Engineers (ITE) Trip Generation Manual. The current version is the seventh.

To calculate potential adverse demolition and construction air quality impacts from the proposed project, the SCAQMD recommends that the lead agency use either the emission calculation methodologies from the Handbook or use the current version of the CARB-approved model URBEMIS 2002, which is available on the SCAQMD website at: [www.aqmd.gov/ceqa/models.html](http://www.aqmd.gov/ceqa/models.html).

If quantification of emissions reveals that the proposed project’s emissions exceed the established significance thresholds, then mitigation measures must be required by the lead agency to reduce emissions to less than significance.