



# South Coast Air Quality Management District

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**FAXED: OCTOBER 18, 2005**

October 18, 2005

Ms. Ellen Gelbard  
City of Santa Monica  
PCD Administration, Room 212  
1685 Main Street  
Santa Monica, CA 90401-3295

Dear Ms. Gelbard:

**Draft Program Environmental Impact Report (DPEIR) for  
The City of Santa Monica Downtown Public Parking Program  
(September 2005)**

The South Coast Air Quality Management District (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 Program Environmental Impact Report.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Program Environmental Impact Report. 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

LACO50906-04  
Control Number

**Draft Program Environmental Impact Report (DPEIR) for  
The City of Santa Monica Downtown Public Parking Program**

1. **Queuing and Idling Emissions:** The lead agency used URBEMIS 2002, a model originally developed by the California Air Resources Board (CARB) and recommended for use by SCAQMD to analyze air quality impacts from land use projects. Operational emissions for the proposed program were calculated by selecting the regional shopping center land use and changing the default trip rate to be consistent with the trip rate established by the traffic analysis. This approach is a generally acceptable approach. The SCAQMD's concern is that the analysis does not account for queuing and idling emissions from vehicles entering and exiting the parking structure. Because parking structures are not a specific land use identified in the URBEMIS 2002 model, the model does not generate queuing or idling emissions from this land use type. SCAQMD staff recommends that mass daily idling and queuing emissions from vehicles entering and exiting the parking structures be estimated separately and then added to operational emissions in Table 4.2-2 on page 4.2-10 of the DPEIR.

Depending on the results of the idling analysis, the CO hotspots analysis may need to be revised to reflect the increased emissions.

2. **Dust Control Supervisor:** In addition to the mitigation measures listed on pages 4.6-26 and 4.6-27 of the DPEIR, SCAQMD staff recommends that given the proximity of the single-family homes, the apartment complex and hospitals to the proposed parking structures, the lead agency identify a dust control supervisor and provide a telephone number that residents can call should they have any complaints regarding excessive PM10 emissions or other nuisance problems during construction.