



South Coast Air Quality Management District

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FAXED: AUGUST 18, 2006

August 18, 2006

Mr. Rick Warsinski
City of Buena Park
Department of Community Development
6650 Beach Boulevard
Buena Park, CA 90622

Dear Mr. Warsinski:

**Initial Study/Negative Declaration (IS/ND) for
Hope Family Housing Project:
August 2006**

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 Negative Declaration.

Please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Negative Declaration. The SCAQMD would be willing 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

ORC060802-03
Control Number

**Initial Study/Negative Declaration (IS/ND) for
Hope Family Housing Project:
August 2006**

Project Emissions: On page 3-7 of the IS/ND, the lead agency states that the proposed project's construction air quality impacts will be less than significant because the project does not exceed the 177 acres threshold for grading area in the screening tables in Chapter 6 of the 1993 SCAQMD CEQA Air Quality Handbook (Handbook). 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 screening 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.

Regarding operational emissions the lead agency states on page 3-8 that the project will result in additional traffic generation, but the increase in daily trips will not be considered significant when added to existing traffic volumes of adjacent roadways and arterials in the project vicinity. The lead agency does not quantify the daily traffic volumes or the additional traffic volumes that will be generated by the proposed project. The lead agency also does not quantify the emissions from either current traffic or the additional traffic that will be generated by the proposed project.

Given the fact that the lead agency has not quantified the proposed project's construction and operational emissions, the lead agency has not demonstrated that the construction and operation of the proposed project will not violate any air quality standard, contribute to an existing or projected air quality violation, or exceed any of the applicable air quality significance thresholds recommended for use by the SCAQMD.

To calculate potential adverse construction and operation 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: www.aqmd.gov/ceqa/models.html.

If quantification of emissions reveals that the 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.

Short-Term Localized Impacts: Consistent with the SCAQMD's environmental justice program and policies, the SCAQMD recommends that the

lead agency also evaluate localized air quality impacts to nearby sensitive receptors, i.e., the high-density multiple family residential building to the east of the proposed project and the single family housing tract to the south of the project site. SCAQMD staff recommends that for this project and for future projects, the lead agency undertake the localized analysis to ensure that all necessary and feasible mitigation measures are implemented to protect the health of nearby sensitive receptors. The methodology for conducting the localized significance thresholds analysis can be found on the SCAQMD website at: www.aqmd.gov/ceqa/handbook/LST/LST.html.

SCAQMD Dust Control Rule: The lead agency incorrectly states on page 3-7 that SCAQMD Rule 51 requires the application of water to stabilize soil at active construction sites. The correct reference is SCAQMD Rule 403 – Fugitive Dust. Please correct this in the final ND.