



South Coast
Air Quality Management District

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FAXED: NOVEMBER 7, 2007

November 7, 2007

Mr. John Mayer
City of South Pasadena
Planning and Building Department
1414 Mission Street
South Pasadena, CA 91030-3298

Dear Mr. Mayer:

**Draft Environmental Impact Report (DEIR) for the Downtown Revitalization
Project: South Pasadena
(September 2007)**

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 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 Environmental Impact Report. The SCAQMD would be available 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
Planning, Rule Development & Area Sources

Attachment

SS: CB

LAC070920-04
Control Number

**Draft Environmental Impact Report (DEIR) for
South Pasadena Downtown Revitalization Project: September 2007**

Urbemis 2007:

The lead agency should be aware that URBEMIS 2007 became available in June 2007. Given the fact that the air quality analysis for the proposed project was already under preparation at the time the URBEMIS 2007 model was released, SCAQMD staff is not requesting that the air quality analysis be revised using the updated model, although the lead agency may wish to update the analysis. However, if the model is used in the future, URBEMIS 2007 should be used to calculate air quality impacts. URBEMIS 2007 is available at the following URL: www.urbemis.com.

Demolition Emissions:

According to the URBEMIS 2002 printout in Appendix 15.5, the total volume of building demolition is 8,000 cubic feet and the daily total volume of building demolition is 1,000 cubic feet. Given that the total area of the buildings to be demolished is 11,950 square feet (pages 3-8 and 5.5-23) 8,000 cubic feet appears to underestimate the total volume of buildings to be demolished, resulting in underestimating the total annual demolition emissions. More importantly, this potential underestimate of the total building volume to be demolished calls into question the total daily demolition volume and associated emissions. Relative to the total daily demolition volume, the lead agency can either revise the estimate upward to more accurately reflect a larger daily demolition volume or keep the analysis, but place a condition on the proposed project limiting total daily demolition to 1,000 cubic feet per day or less. For the annual emissions, the analysis will need to be revised to more accurately reflect the actual total building volume to be demolished, including the volume of demolition debris from the parking spaces in building site B.

Project Consistency:

One of the criteria used to determine project consistency is whether or not the proposed project would exceed the growth projections and other assumptions relating to population, vehicle miles traveled, housing density, and employment in the regional plans. These are assumptions used in the development of the AQMP. The lead agency states on page 5.5-38 of the DEIR that the proposed plan would require an amendment of the City's General Plan from Public Facilities to General Commercial. It is unclear from the discussion on page 5.5-38 whether or not the change in land use designation for building site B from Public Facilities to General Commercial would mean that the growth projections for this site would be consistent with the General Plan and, therefore, the AQMP, given that the change in land use designation would allow residential uses that are not currently allowed at the site. Please provide additional information on whether the change in land use designation would alter growth projections for the site. The lead agency should be aware that the 2007 AQMP was adopted by the SCAQMD Governing Board on June 1, 2007.

Editorial:

The lead agency states incorrectly on page 5.5-26 of the DEIR that the construction VOC significance threshold recommended by the SCAQMD is 150 pounds per day. The daily VOC significance threshold recommended by the SCAQMD is 75 pounds per day. Further, the sum of the total NO_x emissions in Table 5.5-7 is incorrect and should be 167.57 pounds per day not 1647.57 pounds per day. Based on the methodology used by the lead agency, (overlapping construction phases), NO_x emissions of 167.57 pounds per day would exceed the localized significance threshold of 160 pounds per day. These errors should be corrected in the Final EIR.