



# South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

September 20, 2017

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## **Draft Environmental Impact Report (Draft EIR) for the Proposed San Fernando Corridors Specific Plan Amendment (SCH# 2015121088)**

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 EIR.

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

The Lead Agency proposes to redevelop four existing Specific Plan Districts by developing land use policies, development standards, and design guidelines for future development of approximately 759 residential units, 96,307 square feet (s.f.) of retail uses, and 285,907 s.f. of office uses (Proposed Project). The Proposed Project is expected to take place over a planning horizon of 25 years. In the Air Quality Section, the Lead Agency quantified the construction and operational air quality emissions for each District as well as for all four Districts, and compared those emissions to SCAQMD's regional and localized air quality CEQA significance thresholds. Based on the analysis, the Lead Agency found that the Proposed Project's construction and operational air quality impacts for all four Districts combined would be less than significant.

SCAQMD staff is concerned about the air quality analysis. While the analysis assumed that construction activities within each District would overlap, the Lead Agency did not analyze the likelihood that one District may be under construction while development in other Districts are in operation. When the overlapping construction and operational activities are anticipated, SCAQMD staff recommends that the Lead Agency identify the overlapping years, combine construction emissions with operational emissions, and compare the combined emissions to SCAQMD's air quality CEQA operational thresholds of significance to determine the level of significance in the Final EIR. In the event that the Lead Agency, after revising the air quality analysis, finds that the Proposed Project's air quality impacts would be significant, mitigation measures will be required pursuant to CEQA Guidelines Section 15126.4. For more information on potential mitigation measures as guidance to the Lead Agency, please visit SCAQMD's CEQA Air Quality Handbook website<sup>1</sup>.

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<sup>1</sup> South Coast Air Quality Management District. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa>.

Pursuant to the California Public Resources Code Section 21092.5 and CEQA Guidelines Section 15088, SCAQMD staff requests that the Lead Agency provide SCAQMD with written responses to all comments contained herein prior to the certification of the Final EIR. SCAQMD staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Jack Cheng, Air Quality Specialist, CEQA IGR Section, at (909) 396-2448, if you have any questions on the comment.

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS:JC

LAC170815-03

Control Number