



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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Negative Declaration (ND) for the Proposed Coachella Housing Element Update Case No. GPA 21-02 Project (Proposed Project)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The City of Coachella (City) is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. The following comments include information on the Community Emissions Reduction Plan (CERP) for the Assembly Bill 617 (AB 617) designated Eastern Coachella Valley (ECV) community and recommendations on the analysis of potential air quality impacts from the Proposed Project that the Lead Agency should address and include in the Final ND.

South Coast AQMD Staff's Summary of Project Information in the ND

Based on the ND, the Proposed Project consists of updates to the City's General Plan Housing Element.¹ The updates identify sites throughout the City that are available for the construction of housing for all income levels.² The updates also include policies and programs that require changes in the zoning map and zoning text to prioritize lower income housing sites identified in the Housing Element.³ Such updates are intended to accommodate forecasted housing growth in the Proposed Project site.⁴ The Regional Housing Needs Allocation developed by the Southern California Association of Government has allocated 7,886 housing units for the City.⁵ The Proposed Project encompasses a 30.08 square-mile area. The 1-10, SR-86, and SR-111 highways traverse through the Proposed Project site.⁶ The Proposed Project is anticipated to guide development between 2021 to 2029.⁷

South Coast AQMD Staff's Comments

Information on the CERP for the Designated AB 617 ECV Community

The Proposed Project area is heavily impacted by air pollution generated from various sources and includes the AB 617-designated ECV community. An AB 617-designated community requires South Coast AQMD to work with a Community Steering Committee (CSC) to develop a CERP that identifies air quality priorities and actions to reduce air pollution in the community. The South Coast AQMD's Governing Board adopted the AB 617 ECV community CERP in July of 2021.⁸ South Coast AQMD staff recommends that

¹ Negative Declaration. Pages 7 through 8.

² *Ibid.*

³ *Ibid.*

⁴ *Ibid.*

⁵ *Ibid.*

⁶ *Ibid.* Page 9.

⁷ *Ibid.* Pages 7 through 8.

⁸ South Coast AQMD. July 2021. Assembly Bill 617 Eastern Coachella Valley Community Emissions Reduction Plan. Accessed at: <http://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/eastern-coachella-valley/final-cerp/final-cerp-july-2021.pdf>

the Lead Agency review the actions included in Chapter 5 of the adopted CERP and continue working with South Coast AQMD's AB 617 staff to explore whether additional mitigation measures can be identified and implemented by the Proposed Project.

CEQA Air Quality Analysis

The South Coast AQMD's *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*⁹ includes suggested policies that local governments can use in their General Plans or through local planning to prevent or reduce potential air pollution impacts and protect public health. It is recommended that the Lead Agency review this Guidance Document as a tool when making local planning and land use decisions.

The California Air Resources Board's (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective*¹⁰ is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process with additional guidance on strategies to reduce air pollution exposure near high-volume roadways available in CARB's technical advisory.¹¹

Conclusion

Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the ND for adoption together with any comments received during the public review process. Please provide South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final ND. When responding to issues raised in the comments, responses should provide sufficient details giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and the public who are interested in the Proposed Project.

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Evelyn Aguilar, Air Quality Specialist, at eaguilar@aqmd.gov, should you have any questions or wish to discuss the comments.

Sincerely,

Sam Wang

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SW:EA

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⁹ South Coast AQMD. 2005. *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*. Available at: <http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf>.

¹⁰ CARB's *Air Quality and Land Use Handbook: A Community Health Perspective* can be found at: <http://www.arb.ca.gov/ch/handbook.pdf>.

¹¹ CARB's technical advisory can be found at: <https://www.arb.ca.gov/ch/landuse.htm>.