



South Coast Air Quality Management District

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FAXED: OCTOBER 28, 2005

October 28, 2005

Mr. Lee Whittenberg
City of Seal Beach
211 Eighth Street
Seal Beach, CA 90740

Dear Mr. Whittenberg:

Seal Beach Shopping Center Renovation – Mitigated Negative Declaration 05-5

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 Mitigated Negative Declaration.

Please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Mitigated Negative Declaration. 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
ORC051006-01
Control Number

**Seal Beach Shopping Center Renovation:
Mitigated Negative Declaration (MND) 05-5**

1. **Operational Emissions:** The lead agency does not quantify project emissions at buildout. Although the lead agency states on page 25 of the MND that the proposed project will result in a net increase of 12,609 square feet of commercial building area and also increase traffic by 505 vehicle trips per day, the lead agency concludes that the proposed project will not “generate an increase in criteria pollutants that will create a violation of an ambient air quality standard or contribute to an existing air quality violation.” The lead agency does not provide any data to justify this conclusion.

SCAQMD staff recommends that the lead agency use the analysis methodologies in the SCAQMD 1993 CEQA Air Quality Handbook (Handbook) or other approved methodologies to estimate operational emissions. Alternatively, the lead agency may consider using California Air Resources Board (CARB) computer model URBEMIS 2002 to estimate the project’s operational emissions. The model can be accessed at the SCAQMD website:
www.aqmd.gov/ceqa/models.html.

The lead agency should then compare operational emissions from existing uses at the project site with emissions from the proposed project at buildout. If the net emissions exceed the operational significance thresholds for any of the criteria pollutants, the lead agency should recommend measures that would reduce those emissions to less than significance.

2. **Carbon Monoxide (CO) Hot Spots:** On page 25 of the MND, the lead agency identifies carbon monoxide as a pollutant of major concern along roadways and that motor vehicles are the most notable source of carbon monoxide. The lead agency also concludes that the proposed project will increase the number of vehicle trips to the shopping center by 505 trips per day or 8.8 percent. Although the proposed project will increase the number of daily vehicle trips, the lead agency’s traffic analysis does not show what impacts the proposed project will have on the levels of service of nearby intersections. This information is essential because it determines whether or not a CO hotspots analysis is necessary. The SCAQMD recommends that if the level of service at any affected intersections deteriorates from C to D or if the proposed project increases the volume to capacity ratio of any intersection rated D or worse by two percent or more, then a CO hotspots analysis may be warranted.
3. **Construction NO_x Emissions:** Table 10 on page 24 of the MND shows combined daily construction emissions of 99.1 pounds per day of NO_x, which is lower than the NO_x construction significance threshold of 100 pounds per day by less than one pound. To ensure that daily NO_x construction emissions remain less

than significant, the SCAQMD recommends that the lead agency require mitigation measures that limit the hours of operation of construction equipment, require low sulfur (15 ppm or less of sulfur by weight) or emulsified diesel fuels, or other measures that reduce NO_x emissions.