



South Coast
Air Quality Management District

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FAXED: NOVEMBER 16, 2007

November 16, 2007

Ms. Dianne Walter
City of Glendora
Planning and Redevelopment Department
116 East Foothill Boulevard
Glendora, CA 91741

Dear Ms. Walter:

**Mitigated Negative Declaration (MND) for
Niemann Project: Glendora Ventures: SUB06-02, TT# 69502**

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 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

RVLACO71003-01
Control Number

**Mitigated Negative Declaration (MND) for the
Niemann Project – 351 S. Glendora Avenue**

1. Current Project Air Quality Impacts

The Route 66 Specific Plan EIR states on page 5.2-9 that the most recent Air Quality Management Plan (AQMP) was published in 1997. Please note that the most current AQMP was adopted by the SCAQMD Governing Board in June 2007 and approved by California Air Resources Board (ARB) in September 2007.

The lead agency states on page 3 of the Environmental Checklist Form that the EIR for the Route 66 Specific Plan was used as a tiering document for preparation of the initial study for the proposed project. The SCAQMD recognizes that CEQA encourages tiering off of EIRs prepared for a general plan, policy or program, etc. The air quality analysis in the Route 66 Specific Plan was prepared using the URBEMIS 2002 model. Since that time the URBEMIS 2007 model has been released. The URBEMIS 2007 has been updated to: include EMFAC 2007 on-road emission factors and OFFROAD 2007 off-road emission factors, calculate PM 2.5 and CO₂ emissions, etc. As a result, the SCAQMD recommends that the air quality analysis for the proposed project be revised using the URBEMIS 2007 model or other more current methodologies and emissions factors. URBEMIS 2007 can be accessed at the following web site: www.urbemis.com. Please include the URBEMIS model output printout in the appendix to facilitate review.

2. Localized Significance Thresholds

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. SCAQMD staff recommends that for this project and for future projects, the lead agency undertake the localized analysis to ensure that all feasible 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.

3. Project Mitigation

In addition to the mitigation measures listed on page 5.2-22 of the MND the lead agency should consider sample measures discussed in Chapter 11 of the SCAQMD's Handbook or on the SCAQMD's CEQA website at:

www.aqmd.gov/handbook/mitigation/MM_intro.html.