

South Coast Air Quality Management District

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<u>SENT VIA E-MAIL AND USPS:</u> ron.garcia@westcovina.org September 30, 2015

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Draft Mitigated Negative Declaration (Draft MND) For the Proposed West Covina Self Storage Project

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 CEQA document.

Project Description

In the project description, the Lead Agency proposes to construct a 78,474 square foot public storage facility on an undeveloped 0.18-acre site. The proposed building would consist of four levels including a partially subterranean basement level. Soil disturbance will be balanced on-site and the project is expected to take approximately six months to complete starting in the fall of 2015.

Air Quality Analyses

The Lead Agency has determined that project regional air quality impacts would result in less than significant impacts during construction and operations using the current California Emission Estimator Model (CalEEMod).

It is also recommended that the Lead Agency evaluate localized air quality impacts since it is noted in an aerial map inspection and under the environmental settings section on page seven that the proposed project is located within one-quarter mile of sensitive receptors (residential properties) south and southwest of the project site. Therefore, the SCAQMD staff requests that the Lead Agency evaluate localized air quality impacts to ensure that any nearby sensitive receptors are not adversely affected by the construction activities that are occurring in close proximity. SCAQMD guidance for performing a localized air quality analysis can also be found at the SCAQMD website¹. Should the

¹ <u>http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds</u>

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Lead Agency conclude after its analyses that construction or operational air quality impacts exceed the SCAQMD daily significance thresholds, staff has compiled mitigation measures² to be implemented if the air quality impacts are determined to be significant.

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final MND. The SCAQMD staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

Jillian Wong

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² <u>http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies</u>