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SENT VIA E-MAIL: April 10, 2026
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Notice of Preparation of a Draft Environmental Impact Report (EIR) for the Downey 2045 General Plan Update and Zoning Text and Map Amendments Projects (Proposed Project) (SCH#: 2026030591)

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to comment on the above-mentioned document. The following comments provide observations and may include recommendations on the analysis of potential air quality impacts from the Proposed Project that should be included in the Draft EIR. Please transmit copy of the Draft EIR upon its completion and public release directly to South Coast AQMD. **In the transmittal, please also provide electronic versions of all appendices and technical documents related to the air quality, health risk, and greenhouse gas analyses in their original format (e.g., not in .pdf), including but not limited to emission calculation spreadsheets, air quality modeling files, and health risk assessment input and output files.**

CEQA Air Quality Analysis

According to the Notice of Preparation of a Draft EIR, the Proposed Project consists of a comprehensive General Plan Update to guide the City's development through 2045, including 4 new land use designations for a total of 16 designations, a Zoning Text and Map Amendment to create a Residential Corridor Overlay along commercial corridors, and targeted zoning updates to maintain consistency with the General Plan, projected to result in 10,350 new dwelling units and non-residential space (2.7 million square feet), including the land use for manufacturing, by 2045.

Since the upcoming Draft EIR will need to analyze the potential environmental impacts of Downey 2045 General Plan Update and Zoning Text and Map Amendments, the Lead Agency is recommended to include an evaluation in the Draft EIR of a reasonably foreseeable scenario which reflects the maximum development intensity that would be allowed under the proposed land use designations and associated infrastructure expansion at full buildout and disclose the air quality, greenhouse gas, and health risk implications of this growth to the fullest extent feasible.

The Lead Agency should identify all air pollutant sources related to the Proposed Project and analyze/quantify any and all potential air quality and greenhouse gas impacts that could occur during all phases (including overlapping phases) of construction (including demolition) and operation activities associated with the future development that may result from implementing the Community Plan and making the associated infrastructure improvements identified in the Downey 2045 General Plan. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment)

and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips, and hauling trips). For the Proposed Project, construction-related emissions should also include infrastructure-related activities such as roadway improvements, wastewater and water system improvements, flood control and drainage improvements, utility expansion, and other infrastructure needed to support future growth. Operation-related air quality and greenhouse gas impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers and air pollution control devices), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality and greenhouse gas impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis. Furthermore, if the Lead Agency elects to rely on South Coast AQMD's Air Quality Significance Thresholds, [1] the emissions from the overlapping construction and operational activities should be combined and compared to South Coast AQMD's air quality significance thresholds for *operation* to determine the level of significance.

The Lead Agency is recommended to rely on the guidance provided in the South Coast AQMD's CEQA Air Quality Handbook and website[2] when preparing the air quality and greenhouse gas analyses. It is also recommended that the Lead Agency use the California Air Pollution Control Officers Association's California Emissions Estimator Model (CalEEMod)[3] software, to quantify emissions of air pollutants from typical land use development projects.

If the Proposed Project generates diesel emissions from long-term construction or attracts diesel-fueled vehicular trips, especially if heavy-duty diesel-fueled vehicles will be used, it is recommended that the Lead Agency performs a mobile source health risk assessment.[4]

South Coast AQMD has developed a methodology[5] to assist lead agencies with analyzing localized air quality impacts from site-specific projects located near sensitive receptors. However, because the scale of the Proposed Project is large and programmatic in nature, the screening tables which contain localized significance thresholds (LSTs) cannot be relied upon to determine localized impacts. Instead, the Lead Agency is recommended to evaluate the potential localized air quality impacts from the Proposed Project by conducting air dispersion modeling to determine whether the applicable ambient air quality standards would be exceeded.

If the Proposed Project generates diesel emissions from long-term construction or attracts diesel-fueled vehicular trips, especially if heavy-duty diesel-fueled vehicles will be used, the Lead Agency is recommended to perform a mobile source health risk assessment.[6]

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[1] South Coast AQMD Air Quality Significance Thresholds can be found at: https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf.

[2] South Coast AQMD's CEQA Air Quality Handbook and other resources for preparing air quality analyses can be found at: http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook.

[3] CalEEMod is available free of charge at: www.caleemod.com.

[4] South Coast AQMD's guidance for performing a mobile source health risk assessment can be found at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis.

[5] South Coast AQMD's guidance for performing a localized air quality analysis can be found at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds.

[6] South Coast AQMD's guidance for performing a mobile source health risk assessment can be found at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis

Sensitive receptors are people that have an increased sensitivity to air pollution or environmental contaminants and include schools, daycare centers, nursing homes, elderly care facilities, hospitals, and residential dwelling units. The Proposed Project plans for substantial future residential growth and includes a mix of residential, commercial, mixed-use, light industrial, and heavy industrial land uses. Therefore, the Lead Agency is recommended to evaluate the potential health risks to existing and future sensitive receptors from mobile and stationary sources of toxic air contaminants and disclose those potential health risks in the Draft EIR.[7] To the extent feasible, the Draft EIR should identify areas where future sensitive land uses may be exposed to elevated levels of diesel particulate matter (DPM) and other air pollutants, and should include planning-level policies, siting considerations, and mitigation measures to reduce exposures.

Also, if implementation of the Proposed Project would require the use of new stationary and portable sources, including but not limited to emergency generators, fire water pumps, boilers, spray booths, wastewater-related equipment, electrical infrastructure, etc., one or more air permits from South Coast AQMD will be required, and the role of South Coast AQMD would change from a Commenting Agency under CEQA to a Responsible Agency as defined in CEQA Guidelines Section 15381. The assumptions in the air quality analysis in the EIR will be the basis for evaluating the air permit(s) under CEQA and imposing permit conditions and limits. Questions about air permit requirements should be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385.

In addition, CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of evaluating the applications for air permits. For these reasons, Draft EIR should include a discussion about any new stationary and portable equipment requiring South Coast AQMD air permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project, if applicable. Also, as set forth in CEQA Guidelines Section15086, the Lead Agency is required to consult with all Responsible Agencies with discretionary approval authority over the Proposed Project. Thus, if air permits are required and South Coast AQMD is identified as a Responsible Agency, please let this comment letter serve as South Coast AQMD's request to convene a meeting with the Lead Agency as required by CEQA Guidelines Section 15104 to discuss the scope and content of the environmental information that will need to be included in the Draft EIR.

Since the Proposed Project will involve local planning and land use decisions, the Lead Agency is recommended to review and consider applying the recommendations contained in the South Coast AQMD *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning,*[8] which 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.

Health Risk Reduction Strategies

[7] https://www.aqmd.gov/docs/default-source/ceqa/handbook/california-air-resources-board-air-quality-and-land-use-handbook-a-community-health-perspective.pdf

[8] 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.

Many strategies are available to reduce exposures, including, but are not limited to, building filtration systems with MERV 13 or better, or in some cases, MERV 15 or better is recommended; building design, orientation, location; vegetation barriers or landscaping screening, etc. Enhanced filtration units are capable of reducing exposures. However, enhanced filtration systems have limitations. For example, in a study that South Coast AQMD conducted to investigate filters,[9] a cost burden is expected to be within the range of $120 to $240 per year to replace each filter panel. The initial start-up cost could substantially increase if an HVAC system needs to be installed and if standalone filter units are required. Installation costs may vary and include costs for conducting site assessments and obtaining permits and approvals before filters can be installed. Other costs may include filter life monitoring, annual maintenance, and training for conducting maintenance and reporting. In addition, because the filters would not have any effectiveness unless the HVAC system is running, there may be increased energy consumption that the Lead Agency should evaluate in the Draft EIR. It is typically assumed that the filters operate 100 percent of the time while residents are indoors, and the environmental analysis does not generally account for the times when the residents have their windows or doors open or are in common space areas of the project. These filters have no ability to filter out any toxic gases. Furthermore, when used filters are replaced, replacement has the potential to result in emissions from the transportation of used filters at disposal sites and generate solid waste that the Lead Agency should evaluate in the Draft EIR. Therefore, the presumed effectiveness and feasibility of any filtration units should be carefully evaluated in more detail prior to assuming that they will sufficiently alleviate exposures to diesel particulate matter emissions.

South Coast AQMD staff are available to work with the Lead Agency to ensure that air quality, greenhouse gas, and health risk impacts from the Proposed Project are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact Sahar Ghadimi, Air Quality Specialist, at sghadimi@aqmd.gov.

Sincerely,

Sam Wang

Sam Wang
Program Supervisor, CEQA IGR
Planning, Rule Development & Implementation

SW:SG
RVC260319-02
Control Number

[9] This study evaluated filters rated MERV 13 or better. Accessed at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf. Also see 2012 Peer Review Journal article by South Coast AQMD: https://onlinelibrary.wiley.com/doi/10.1111/ina.12013.