



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:

August 5, 2026

OakPark@cityofirvine.org

Eric Martin, Senior Planner

City of Irvine,

Community Development Department

PO Box 19575

Irvine, California 92623-9575

Notice of Preparation of a Draft Subsequent Environmental Impact Report (Draft SEIR)
for the
Planning Area 52 Project (File Nos. 00956521-PGA, 00956519-PZC, and 00986547-PDA)
(Proposed Project) (SCH# 2023070463)

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 SEIR. Please transmit copy of the Draft SEIR 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 (NOP), the proposed Planning Area 52 Project would establish a new residential village encompassing approximately 281 acres in the City of Irvine. The Proposed Project includes development of up to 2,400 residential units, a Kindergarten through 6th grade elementary school site, public and neighborhood parks, a public nature park and trail system, and associated on- and off-site circulation and utility infrastructure improvements. The Project would also involve redevelopment of the existing Oak Creek Golf Course and four office buildings within the Oak Creek Business Center, as well as development of vacant land within the Innovation Office Park that was previously entitled for office development. In addition, the Project includes improvements to the Jeffrey Open Space Trail and new pedestrian/bicycle bridges over the railroad tracks and Irvine Center Drive, as well as an above-grade railroad crossing associated with the proposed extension of Oak Canyon.

Given the scale and mix of proposed residential, educational, recreational, commercial, transportation, and infrastructure improvements, the Lead Agency is recommended to ensure that the Draft SEIR evaluates the potential environmental impacts associated with the reasonably foreseeable development scenario at full buildout of the proposed Project. In particular, the Draft SEIR should comprehensively evaluate and disclose potential air quality, greenhouse gas emissions, and health risk impacts associated with the proposed development, including emissions

from construction and operational activities, increased vehicle travel, and other mobile and area sources, to the fullest extent feasible.

When preparing the air quality and greenhouse gas analyses, the Lead Agency is recommended to rely on the guidance provided in the South Coast AQMD's CEQA Air Quality Handbook and website¹ and utilize the California Air Pollution Control Officers Association's California Emissions Estimator Model (CalEEMod)² software to quantify emissions of air pollutants from the land use development activities associated with the Proposed Project.

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 Cabazon Infrastructure 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,³ 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.

South Coast AQMD has developed a methodology⁴ to assist lead agencies with analyzing localized air quality impacts from site-specific projects located near sensitive receptors. However, because 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.

¹ 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>.

² CalEEMod is available free of charge at: www.caleemod.com.

³ 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>.

⁴ 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>.

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.⁵

To assist with identifying ways to minimize air quality impacts from the Proposed Project, the Lead Agency is also recommended to consult and apply the guidance from the California Air Resources Board (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective*,⁶ which 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. CARB has another helpful technical advisory, *Strategy to Reduce Air Pollution Exposure Near High-Volume Roadways*, which contains additional guidance on strategies to reduce air pollution exposure of Proposed Projects located near high-volume roadways.⁷

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.

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 SEIR 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, the Draft SEIR 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 Section 15086, 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

⁵ 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>

⁶ CARB's *Air Quality and Land Use Handbook: A Community Health Perspective* can be found at: <https://www.aqmd.gov/docs/default-source/ceqa/handbook/california-air-resources-board-air-quality-and-land-use-handbook-a-community-health-perspective.pdf>.

⁷ CARB's *Strategy to Reduce Air Pollution Exposure Near High-Volume Roadways*, April 2017, available at: https://ww2.arb.ca.gov/sites/default/files/2017-10/rd_technical_advisory_final.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>.

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 SEIR.

To minimize the impacts of DPM from the Proposed Project and avoid exacerbating existing conditions, the Lead Agency is encouraged to evaluate either quantitatively or qualitatively the potential health risk impacts to nearby sensitive receptors and if significant impacts are identified, to include mitigation measures in the Draft SEIR (which are discussed later in this letter) that would reduce or eliminate the DPM health risks to the surrounding community.

Mitigation Measures

In the event that the Proposed Project results in significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize these impacts. Any impacts resulting from mitigation measures must also be analyzed. Several resources to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project include South Coast AQMD's CEQA Air Quality Handbook,⁹ South Coast AQMD's Mitigation Monitoring and Reporting Plan for the 2022 Air Quality Management Plan,¹⁰ and Southern California Association of Government's Mitigation Monitoring and Reporting Plan for the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy.¹¹

South Coast AQMD staff is 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 me, at swang1@aqmd.gov.

Sincerely,

Sam Wang

Sam Wang

Program Supervisor, CEQA IGR

Planning, Rule Development & Implementation

SW

ORC260708-03

Control Number

⁹ South Coast AQMD's CEQA Air Quality Handbook, Available at: <https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>

¹⁰ South Coast AQMD's 2022 Air Quality Management Plan can be found at: <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan> (Chapter 4 - Control Strategy and Implementation).

¹¹ Southern California Association of Governments' 2020-2045 RTP/SCS can be found at: https://www.connectsocial.org/Documents/PEIR/certified/Exhibit-A_ConnectSoCal_PEIR.pdf.