



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

E-mailed:
fbuss@lcf.ca.gov

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Mr. Fred Buss
Planning Division
1327 Foothill Boulevard
La Canada Flintridge, CA 91011-2137

Review of the Draft Environmental Impact Report (Draft EIR) for the La Canada Flintridge General Plan Update

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document. The following comment is intended to provide guidance to the lead agency and should be incorporated into the final Environmental Impact Report (final EIR) as appropriate.

Sensitive Land Uses

The AQMD staff recognizes that the proposed project may provide regional air quality benefits by adding mixed land use designations within the city's boundary. However, the AQMD staff is concerned that the proposed project will place mixed use development adjacent to the SR-2/I-210 interchange (See Figure 2-3 of the draft EIR). As a result, sensitive land uses (e.g., parks, day care centers, nursing homes, hospitals, and residential communities) could be placed in close proximity to a significant source of toxic air pollutants resulting in potentially significant health risk impacts.

Based on Section 4.2 (Air Quality) in the draft EIR the lead agency determined that implementation of mitigation measure AQ-2 would reduce all potential health risk impacts to sensitive receptors near the SR-2/I-210 interchange to a level of insignificance. Since the effectiveness of mitigation measure AQ-2 was not quantified in the draft EIR the lead agency should revise the EIR to demonstrate (i.e., quantify) that AQ-2 will reduce all potential health risk impacts to future sensitive receptors to an insignificant level including from potential outdoor exposure. In the event that the lead agency cannot quantitatively determine that the proposed project will yield less than significant health risk impacts from siting sensitive land uses in close proximity to the SR-2/I-210 interchange the lead agency should provide mitigation that precludes

development within 500 feet of the SR-2/I-210 interchange¹ or require any development within 500 feet to have less than significant health risk impacts as determined by a site-specific health risk assessment that conforms to AQMD guidelines.

Revised Regional Air Quality Emissions Analysis

AQMD staff notes that based on Table 4.2-5 the proposed project will exceed Regional Air Quality CEQA Thresholds for PM10 and PM 2.5 emissions. Based on correspondence with the lead agency the aforementioned table will be revised in the final EIR to demonstrate less than significant regional air quality impacts,² due to a revised calculation for re-entrained road dust. If the published final EIR finds significant PM impacts, additional mitigation should be considered to reduce this impact to a less than significant level.

Written Responses and Contact Information

Pursuant to Public Resources Code Section 21092.5, please provide the AQMD with written responses to all comments contained herein prior to the adoption of the final EIR. Further, staff is available to work with the lead agency to address these issues and any other questions regarding air quality that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,



Ian MacMillan
Program Supervisor, CEQA Inter-Governmental Review
Planning, Rule Development & Area Sources

Attachment

IM:DG

LAC101223-02
Control Number

¹California Air Resources Board. April 2005. "Air Quality and Land Use Handbook: A Community Health Perspective." Accessed at:<http://www.arb.ca.gov/ch/landuse.htm>

² Based on AQMD staff's e-mail communication with Mr. Charles Richmond of ICF International Inc. on behalf of the lead agency.