



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Draft Subsequent Environmental Impact Report (SEIR) for the Proposed Lakeview Senior Living (SCH No.: 2017051014)

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comment is meant as guidance for the Lead Agency and should be incorporated into the Final SEIR.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to an age-restricted senior living facility with a mix of 82 independent living units, assisted living (72 beds), and memory care (82 beds) on 4.99 acres (Proposed Project). Construction is expected to take approximately 24 months to complete¹.

SCAQMD Staff's Comments

Based on a review of the Draft SEIR, SCAQMD staff found that the Proposed Project was an active oil field with up to seven oil production wells from 1927 until recent. SCAQMD staff is concerned about the potential air quality impacts from volatile organic compounds (VOCs) contaminated soils during ground disturbance activities. Disturbing soils may contain petroleum hydrocarbons and are subject to the requirements of SCAQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil². Therefore, Rule 1166 should be incorporated during the development of the Final SEIR. The Lead Agency should include a discussion on how the Proposed Project will comply with Rule 1166 requirements in the Air Quality Section of the Final SEIR. If remediation or any on-site activity involves equipment or operations which either emits or controls air pollution, SCAQMD staff should be consulted in advance of the Project start to determine whether or not any permits or plans are required to be filed and approved by SCAQMD prior to start of the operation. Furthermore, while the Draft SEIR included a discussion on SCAQMD Rule 402 – Public Nuisance³ with respect to odors, SCAQMD staff recommends that the Lead Agency include a discussion on how the Proposed Project will comply with Rule 402 if VOCs are emitted during soil disturbance activities.

Closing

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), SCAQMD staff requests that the Lead Agency provide SCAQMD staff with written responses to all comments contained herein prior to the certification of the Final SEIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful or useful to decision makers and to the public who are interested in the Proposed Project.

¹ Draft SEIR. Page 8-7.

² Draft SEIR. Page 8-12.

³ South Coast Air Quality Management District. Rule 1166. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>.

SCAQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact me at lsun@aqmd.gov if you have any questions.

Sincerely,



Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS

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