



South Coast Air Quality Management District

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

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CDD@southpasadenaca.gov

Alison Becker, Deputy Director of Community Development
City of South Pasadena
1414 Mission Street
South Pasadena, CA 91030

Notice of Availability of a Draft Program Environmental Impact Report (PEIR) for the South Pasadena General Plan and Downtown Specific Plan Update, and 2021-2029 Housing Element Project (Proposed Project)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The City of South Pasadena is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. The following comments include completion of CEQA air quality impact analysis during construction and operational activities, Health Risk Assessment (HRA) during project operation, additional air quality mitigation measures recommended for construction, overlapping construction and operational activities, and information about South Coast AQMD rules and permits that the Lead Agency should include in the Final PEIR.

South Coast AQMD Staff's Summary of Project Information in the Draft PEIR

The Lead Agency envisions development of the Proposed Project to align local and regional development objectives, thereby fostering more affordable housing choices in the South Pasadena region; The Proposed Project also aims to effectively address concerns related the persistent growth pressure in the San Gabriel Valley.¹

Based on the Program EIR, the Lead Agency proposes the construction of 2,775 residential units and 430,000 square feet of non-residential uses, including retail and office development on 2,272 acres.² The project is bounded by Pasadena to the north, San Marino to the east, Alhambra to the south, and Los Angeles to the southwest.³ For this PEIR, the development of the proposed growth identified in the General Plan is assumed to occur by the horizon year of 2040.⁴

South Coast AQMD Staff's Comments

Completion of CEQA Air Quality Impacts Analysis During Construction and Operation Activities

Based on the Draft PEIR, only one daily emission table has been provided by the lead agency for determining the significance of the regional air quality impacts during project operation in the air

¹ Draft PEIR. p.11.

² Ibid. p. 13.

³ Ibid. p. 12.

⁴ Ibid. p. 66.

quality analysis,⁵ with no emissions provided for the localized significant thresholds (LSTs) for operational, and no analysis has been performed for constructional emissions. The lead agency has stated that the Draft PEIR does not contain analysis on air pollutant emissions from construction activities, citing the absence of specific development proposals within the General Plan and Downtown Specific Plan (DTSP) Update & 2021–2029 Housing Element Implementation Program. Nevertheless, even though the precise projects have yet to be defined, in pursuant of the CEQA section 15183.5 -Tiering and streamlining the Analysis of Greenhouse Gas (GHG) Emissions- the lead agency may analyze the significant effects of the greenhouse gas emission at a programmatic level, such as a general plan or a long-ranged development plan. Later project-specific environmental documents may tier from and/or incorporated by reference that existing programmatic review. Additionally, in pursuant to CEQA guidelines section 15064 -Determining the Significance of the Environmental Effects Caused by a project – the lead Agency is responsible for performing an in-depth and detailed analysis of an estimation of the potential air quality impact arising from the construction of 2,775 residential units and 430,000 square feet of non-residential spaces, including retail and office developments in the designated area. Alternatively, the lead agency can tear out the projects and examine a worst-case scenario construction emission, wherein the estimated construction impacts can be roughly assessed. Therefore, South Coast AQMD staff recommends that the Lead Agency revise the air quality analysis section to include:

- 1) Estimated the maximum daily on-site construction emissions using CalEEMod⁶ land use emissions software, and subsequently, compare these emissions against the South Coast AQMD LSTs.
- 2) Quantify criteria pollutant emissions and GHG emissions using CalEEMod land use emissions software and compare the emissions to South Coast AQMD’s CEQA regional pollutant emissions significant thresholds.⁷
- 3) Estimated the maximum daily on-site operational emissions using CalEEMod land use emissions software, and subsequently, compare these emissions against the South Coast AQMD LSTs.

It is important to note that the localized analysis can be conducted either by using the LST screening tables or by performing dispersion modeling.

This analysis will provide us with a preliminary assessment of the potential air quality impacts, both at the regional and localized levels, arising from the Proposed Project.

Health Risk Assessment (HRA) During Project Operation

Health risk analysis involves quantifying the exposure of the sensitive receptors to toxic air contaminants (TACs), specifically diesel particulate matter (DPM). The lead agency has stated

⁵ Ibid. p. 132.

⁶ CalEEMod is available free of charge at:
www.caleemod.com.

⁷ South Coast AQMD’s CEQA regional pollutant emissions significance thresholds can be found at:
<https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf>

that, due to the absence of the site-specific information, conducting a precise HRA tailored to this specific location would be speculative at this stage. As a result, the potential cancer risk linked to the individual project remains unknown. However, it is important to note that since the Proposed Project site is located in close proximity to the SR-110 freeway, which experiences a high volume of diesel trucks emitting DPM and posing high adverse cancer risks to the sensitive land uses, it is highly recommended the lead agency conducts quantitative, or at least qualitative mobile source HRA in the project. This is essential for the purpose of an EIR as an informational document. To ensure that the HRA is conservative and protective, we recommend the lead agency perform the HRA using the worst-case project scenario. This comprehensive approach will inform the public and decision-makers about the potential health risks to the sensitive land uses of the Proposed Project.

Additional Air Quality Mitigation Measures Recommended for Construction

Considering the long-range plan of the Proposed Project from 2023-2040, off-road engines meeting CARB Tier 4 emission control technology standards may not represent the cleanest option when construction occurs later for individual projects. According to CARB Strategies for Reducing Emissions from Off-Road Construction Equipment, the implementation of off-road Tier 5 standards, beginning in 2027 or 2028, along with the Governor's Executive Order in September 2020, requires CARB to develop and propose a full transition to Zero Emissions (ZE) by 2035.⁸ Given the scope of the project, it is crucial to ensure that the construction emissions, specifically NO_x and PM₁₀, remain below significant thresholds during the construction period for each proposed individual project. To achieve this goal, where feasible, opting for electric emission-free engines instead of diesel-fueled ones for the construction equipment is recommended. This proactive choice not only aligns with environmental concerns but also demonstrates a commitment to minimizing the project's environmental footprints. To mitigate NO_x emissions, the Proposed Project should consider promoting greener construction practices, such as limiting the older engines use in favor of latest available advanced technologies or choosing to retrofit some to cutting-edge cleaner exhaust aftertreatment techniques. Additionally, the South Coast AQMD's CEQA Air Quality Handbook⁹ offer resources to help the Lead Agency identify additional potential mitigation measures for the Proposed Project for both operational and construction emissions.

Overlapping Construction and Operational Activities

While the Proposed Project spans approximately 2,272 acres of land and involves a 17-year construction period, the Draft PEIR does not address the scenario of overlapping construction and operational activities. Therefore, South Coast AQMD staff recommends that the Lead Agency revise the air quality analysis section to consider this overlapping air quality impacts. The estimated emissions during overlapping phases should then be compared to South Coast

⁸ Presentation can be found at:

<http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/combined-construction-carb-amp-aqmp-presentations-01-27-21.pdf>

⁹South Coast AQMD's CEQA Air Quality Handbook

<http://www.aqmd.gov/docs/default-source/ceqa/handbook/capcoa-quantifying-greenhouse-gas-mitigation-measures.pdf>

AQMD's regional air quality CEQA operational thresholds to determine their level of significance, which should be included in the Final PEIR. If the overlapped emissions analysis is not included in the Final PEIR, the Lead Agency should provide reasons for this omission, supported by substantial evidence in the record.

South Coast AQMD Permits and Responsible Agency

If the implementation of the Proposed Project would require the use of new stationary equipment (e.g., internal combustion engines), permits from South Coast AQMD are required. The Final PEIR should include a discussion on any existing and new stationary equipment requiring South Coast AQMD permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project. Any assumptions used for the stationary sources in the Final PEIR will also be used as the basis for the permit conditions and limits for the Proposed Project. Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions on permits. For more general information on permits, please visit South Coast AQMD's webpage at: <http://www.aqmd.gov/home/permits>.

Conclusion

According to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the Draft PEIR for adoption together with any comments received during the public review process. Please provide South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final PEIR. When the Lead Agency's position is at variance with recommendations raised in the comments, the 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 and reasoned analysis in response. Conclusory statements unsupported by factual information do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision-makers and the public who are interested in the Proposed Project.

We appreciate the opportunity to review the Proposed Project. Thank you for considering these comments. South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Sahar Ghadimi, Air Quality Specialist, at sghadimi@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

Sam Wang

Program Supervisor, CEQA IGR

Planning, Rule Development & Implementation

SW:SG

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