



# South Coast Air Quality Management District

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

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Mr. Scott Kinsey, [scott.kinsey@longbeach.gov](mailto:scott.kinsey@longbeach.gov)  
Department of Development Services  
Planning Bureau, 5<sup>th</sup> Floor  
City of Long Beach  
333 W. Ocean Boulevard  
Long Beach, CA 90802

## **Draft Mitigated Negative Declaration (Draft MND) for the Proposed Pine Square Theater Conversion to Residential Project**

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

In the Draft MND project description, the lead agency proposes construction that would include conversion of a closed movie theater into 69 residential units totaling 112,079 square feet and also conversion of a small amount of floor area totaling 37,240 square feet for retail space. The Draft MND concludes in Section III that potential construction air quality impacts would be less than significant but does not quantify the project's construction or operation air quality impacts. Because this information has not been included in the Draft MND, the lead agency has therefore not demonstrated that the proposed project will not generate significant adverse regional, localized<sup>1</sup> or greenhouse gas (GHG) emission impacts that may trigger further analysis OR MITIGATION pursuant to the California Environmental Quality Act.

To calculate the proposed project's emission impacts, the lead agency can utilize the new California Emission Estimator Model (CalEEMod) land use emissions model, which can be accessed at <http://www.caleemod.com> or follow the calculation methodologies in Chapter 9 and the Appendix to Chapter 9 in the South Coast AQMD's CEQA Air Quality Handbook.

Please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. The AQMD staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

<sup>1</sup> <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>

Sincerely,

A handwritten signature in black ink that reads "Ian V. MacMillan". The signature is written in a cursive, slightly slanted style.

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

IM:GM

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