



# South Coast Air Quality Management District

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April 1, 2016

## **Draft Mitigated Negative Declaration (Draft MND) for the Proposed Roadway Improvements Beneath the SR-91 Overpass**

The South Coast Air Quality Management District (SCAQMD) staff 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 MND. In the project description, the Lead Agency proposes to widen Bellflower Boulevard between SR-91 Freeway and Artesia Boulevard.

In the Draft MND, the Lead Agency proposes roadway improvements but does not quantify the project construction emission impacts. In order to demonstrate the Lead Agency's findings, the SCAQMD staff recommends estimating project construction emission impacts and comparing those estimates with the SCAQMD recommended regional and localized thresholds of significance. Roadway construction impacts and project emissions from the demolition of the two buildings can be estimated using the California Emissions Estimator Model (CalEEMod)<sup>1</sup> land use emissions model or by following the calculation methodologies in Chapter 9 and the Appendix to Chapter 9 in the in the SCAQMD's CEQA Air Quality Handbook.<sup>2</sup>

Should the Lead Agency conclude after its analyses that the air quality impacts exceed the SCAQMD daily significance thresholds,<sup>3</sup> SCAQMD staff has compiled mitigation measures to be implemented if the air quality impacts are determined to be significant. Mitigation measure suggestions can be located on the SCAQMD website.<sup>4</sup>

The location of the proposed project is adjacent to sensitive land uses<sup>5</sup> (i.e., residential dwellings west of the project site), the Draft MND did not evaluate potential localized air quality impacts that could result from the construction and operation of the proposed project. Therefore, the SCAQMD staff recommends that the Lead Agency include in the air quality analysis an assessment of potential localized air quality impacts of the proposed project. These potential air quality impacts should be assessed using SCAQMD's Localized Significance Methodology and compared to the localized significance thresholds specific to the project area<sup>6</sup>.

<sup>1</sup> CalEEMod website at: <http://www.caleemod.com>

<sup>2</sup> SCAQMD website: [http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993))

<sup>3</sup> SCAQMD regional thresholds: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>; Localized thresholds: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

<sup>4</sup> Mitigation Measures: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>

<sup>5</sup> California 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>

<sup>6</sup> The Localized Significance Threshold (LST) methodology and Mass Rate LST Look Up Table is available at: <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>

The SCAQMD staff is available to work with the lead agency to address these concerns and any other air quality questions that may arise. Please contact Jack Cheng, Air Quality Specialist at (909) 396-2448, if you have any questions regarding these comments. We look forward to reviewing the Final MND associated with this project.

Sincerely,

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LAC160302-03  
Control Number