

agency empowered to regulate stationary and mobile sources in the South Coast Air Basin.

To determine whether a project generates sufficient quantities of air pollution to be considered significant, the SCAQMD adopted maximum thresholds of significance for mobile and stationary producers in the South Coast Air Basin (SCAB), (i.e., cars, trucks, buses and energy consumption). SCAQMD Conformity Procedures (Section 6.3 of the CEQA Air Quality Handbook, April 1993) states that all government actions that generate emission greater than the following thresholds are considered regionally significant:

SCAQMD Significance Thresholds

Pollutant	Construction Thresholds (lbs/day)	Operational Thresholds (lbs/day)
ROG	75	55
NO _x	100	55
CO	550	550
PM ₁₀	150	150
SO _x	150	150

Construction emissions would stem from excavation efforts for the one-level subterranean garage and from the development of the new senior assisted living facility. Construction emissions were based on an 18-month time period and were estimated using the URBEMIS 8.7 software. The estimated results are:

	ROG	NO_x	CO	PM₁₀
2008	25.17	167.48	202.57	6.48
2009	25.16	161.29	206.44	5.99
2010	103.76	155.72	211.56	5.48
AQMD Thresholds	75	100	550	150
Exceeds Thresholds	Yes	Yes	No	No

The primary long-term emission source from the proposed project would be vehicles driven by facility staff, residents, and guests of the residents. A secondary source of operational emissions would be the consumption of natural gas in the use of landscape maintenance equipment. Estimated operational (vehicle) emissions from the project are listed in the table below. The source of these estimates was the URBEMIS 8.7 software. Based upon the estimates, the proposed project would not exceed threshold levels for mobile emissions.

	ROG	NO _x	CO	PM ₁₀
Project Emissions	1.60	0.81	8.93	0.93
AQMD Thresholds	55	55	550	150
Exceeds Thresholds	No	No	No	No

The following mitigation measure is included to reduce the impacts of the construction emissions. The requirements of Rule 403 will reduce the construction-related impacts to below significance.

II-1 As required by South Coast Air Quality Management District Rule 403 - Fugitive Dust, all construction activities that are capable of generating fugitive dust are required to implement dust control measures during each phase of project development to reduce the amount of particulate matter entrained in the ambient air. The measures shall be printed on the final grading and construction plans. They include the following:

- Application of soil stabilizers to inactive construction areas.
- Quick replacement of ground cover in disturbed areas (as applicable).
- Watering of exposed surfaces twice daily.
- Watering of all unpaved haul roads three times daily.
- Covering all stockpiles with tarp.
- Reduction of vehicle speed on unpaved roads.
- Post sign on-site limiting traffic to 15 miles per hour or less.
- Sweep streets adjacent to the project site at the end of the day if visible soil material is carried over to adjacent roads.
- Cover or have water applied to the exposed surface of all trucks hauling dirt, sand, soil, or other loose materials prior to leaving the site to prevent dust from impacting the surrounding areas.

c. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Less than Significant Impact.

Please see III (b) above for discussion.

- 2) Alternatively, if the appearance of proximate development in commercial zones is to be considered in determinations of residential aesthetics, provide the Planning Commission and City Council with Citywide mapping identifying all areas of “urbanized character” and “mixture of land uses and building heights” similar to the proposed site.

Comment 5

Discussion of Environmental Impacts: I Aesthetics, c I-1

Development is projected to take 15 months. I-1 promises a Construction and Staging Management Plan will be approved prior to issuing permits. This project would require excavation and construction encompassing very nearly the entire area of a small lot located at the corner of two narrow streets adjacent to residential areas and a school. The aesthetic difficulties of construction management warrant more analysis than a promise of an eventual plan addressing a standard list of items.

Recommendation

Provide a detailed plan identifying and proposing mitigation of the aesthetic impacts of project construction as part of the MND.

Comment 6

Discussion of Environmental Impacts: III Air Quality, b

Section I c of the MND estimates construction to take 15 months. Construction emission calculations in pounds per day are based, however, on an 18-month construction period. Basing calculations on a longer construction period will reduce calculated daily emissions by an amount proportional to the time extension. If the 15-month time period is correct, calculated daily emissions would increase 20% over those shown in the MND.

Construction emissions are estimated to exceed the SCAQMD regional Significance Thresholds in both the ROG and NOX categories, yet no discussion of the impact nor mitigation of these emissions is offered.

Though emissions are calculated and compared to regional Significance Thresholds, the MND presents no comparison to Local Significance Thresholds for either construction or operation.

The emissions were calculated using the SCAQMD URBEMIS 8.7 software. This software dates to April 2005 and was replaced by URBEMIS 9.24 in February 2008. 9.24 improves modeling of both onroad and offroad equipment and calculates PM2.5 particle emissions (potentially a greater health threat than the larger PM10 particles) as well as emissions of CO2. (Source SCAQMD website)

The MND identifies, as a secondary source of operational emissions, the consumption of natural gas in the use of landscape equipment. Should this be consumption of gasoline ?

Assisted living facilities may use back-up generators to provide emergency electrical power. No mention is made of emissions related to fuel storage, exercising or operation of a backup generator.

None of the data used as the basis for any of the air quality calculations or the calculations themselves are shown.

Recommendations

- 1) Determine the correct construction period. Correct the relevant section(s) of the MND. Correct the emissions calculations if incorrect.
- 2) Provide analysis of the impacts and mitigation of construction emissions estimated to exceed the regional Significance Thresholds
- 3) Compare estimated emissions with appropriate Local Significance Thresholds and provide analysis of the impact and mitigation of any emissions calculated to exceed LSTs.
- 4) Update all emissions calculations using the latest version of software and include PM2.5 and CO2.
- 5) Determine and if necessary correct the fuel used for landscape equipment. Correct emissions calculations if affected.
- 6) Determine if a backup generator will be used at the proposed facility and if so the fuel to be used. Correct emissions calculations.
- 7) Provide as an appendix or as appendices, the sources, data and the assumptions underpinning the emissions calculations and the calculations themselves.

Comment 7

Discussion of Environmental Impacts: III Air Quality d

The project site is across the street from a school and very near residential areas. The MND merely asserts, with no analysis or explanation that no substantial levels of any pollutant would be anticipated that could affect sensitive receptors, identified as children, athletes elderly or sick individuals. The MND however also estimates a construction period of over one year with significant excavation, identifies dust and pollutant emissions during construction, (some in excess of Significance Thresholds) and operation.

Recommendation:

Provide data, analysis and explanation supporting the conclusion of a Less Than Significant Impact.

Comment 8

Discussion of Environmental Impacts: VII Hazards and Hazardous Materials c

FAXED: October 3, 2008

October 3, 2008

Mr. Steve Valdez, Planner
Development Services
333 West Ocean Boulevard, 5th Floor
Long Beach, CA 90802

**Notice of Intent to adopt a Mitigated Negative Declaration (MND) for
the Senior Community Housing Project**

The South Coast Air Quality Management District (SCAQMD) 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 proposed Mitigated Negative Declaration (MND).

Because the lead agency did not provide a copy of the draft MND during the public comment period, SCAQMD staff received the proposed MND on September 12, 2008, past the close of the public comment period on August 19, 2008. The SCAQMD is the air quality agency for the South Coast Air Basin, which includes the city of Long Beach. In accordance with the intergovernmental review (IGR) responsibilities under CEQA, SCAQMD staff requests that the City send all future CEQA documents where the city is the lead agency to the SCAQMD at the beginning of the comment period for each project to allow the SCAQMD to fulfill its IGR responsibility to review and potentially comment on the air quality analysis prepared by the City. The SCAQMD staff is available to work with the Lead Agency to address these issues and any other questions 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,

Steve Smith
Program Supervisor – CEQA Section
Planning, Rule Development & Area Sources

Attachment

SS:DG
LAC0 80930-09
Control Number

Air Quality Analysis -Construction Emissions

1. The Initial Study states that the lead agency estimated construction and operational air quality impacts using the URBEMIS 2002 version 8.7 computer model. The lead agency should be aware that the most current version of the URBEMIS model, URBEMIS2007, was released in September 2007. Because mobile source emission factors are substantially different between URBEMIS 2002 and URBEMIS 2007, SCAQMD staff requests that the lead agency update the air quality analysis using URBEMIS 2007. If the lead agency uses the model for future projects, the SCAQMD recommends that URBEMIS2007 be used. URBEMIS 2007 version 9.2.4 can be accessed at <http://www.urbemis.com/> or the lead agency can follow the calculation methodologies in Chapter 9 and the Appendix to Chapter 9 in the SCAQMD's CEQA Air Quality Handbook.

Once the air quality analysis has been revised the SCAQMD requests that the lead agency revise the Initial Study quantifying peak daily air quality impacts and summarizing all emissions (i.e. NO_x, SO_x, CO, PM₁₀, PM_{2.5} and ROG) from the planned construction and operational activities including; cut-and-fill operations, grading, and on-road and off-road mobile sources. If air quality methodologies other than the URBEMIS 2007 model are used, the Initial Study should also include a description of construction equipment with the corresponding emission factors and methodologies that are used to quantify the peak daily construction and operation air quality impacts from the proposed project.

2. The lead agency provides construction air quality impact results for the proposed project on page 25 and operational air quality impact results on page 26. The URBEMIS 2002 output sheets were not included with the initial study, so SCAQMD staff could not confirm the lead agency's results. SCAQMD staff made a request to the lead agency to provide the URBEMIS 2002 output sheets, but the lead agency was unable to accommodate this request. As already noted, however, the SCAQMD requests that the lead agency revise the air quality analysis by using the most current version of the URBEMIS model, URBEMIS 2007 version 9.2.4.
3. Based on the construction air quality results presented on page 25, the lead agency shows that peak daily construction NO_x emissions exceed the SCAQMD's recommended daily regional NO_x significance threshold. The lead agency then concludes that complying with the requirements of SCAQMD Rule 403 will reduce construction air quality impacts to less than significant. The lead agency should be aware that Rule 403 only regulates fugitive dust and does nothing to reduce NO_x emissions. As a result, the lead agency has not demonstrated that NO_x emissions are less than significant and, therefore, the proposed project may not qualify for an MND unless NO_x mitigation measures are identified that can reduce NO_x emissions to less than the NO_x construction significance threshold.
4. Section VII, Hazards and Hazardous Material and the Location Map provided in Attachment A of the Initial Study for the Proposed MND indicates that the proposed project site is located within one-quarter mile of sensitive receptors (i.e. residential properties and more than one school site). Thus, the SCAQMD requests that the lead agency revise the air quality analysis to evaluate localized air quality impacts and ensure that nearby sensitive receptors are not adversely affected by the construction activities that are occurring in close proximity.

SCAQMD guidance for performing a localized air quality analysis can be found at the following web address: <http://www.aqmd.gov/ceqa/handbook/LST/LST.html> .

In the event that the lead agency's revised regional air quality analysis requested in comment #1 and/or the localized air quality analysis requested in this comment demonstrate that any criteria pollutant emissions exceed the SCAQMD's daily significance thresholds, the SCAQMD recommends that the lead agency consider adding the following mitigation measures to further reduce air quality impacts from the construction phase of the project, if feasible:

NOx:

- Prohibit vehicle and engine idling in excess of five minutes and ensure that all off-road equipment is compliant with the California Air Resources Board's (CARB) in-use off-road diesel vehicle regulation and SCAQMD Rule 2449,
- Require construction equipment to meet or exceed Tier 3 standards with available CARB verified or certified technologies,
- Require the use of alternative fueled off-road construction equipment,
- Require the use electricity from power poles rather than temporary diesel or gasoline power generators,
- Require construction parking to be configured such that traffic interference is minimized,
- Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow,
- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site,
- Schedule construction activities that affect traffic flow on the arterial system to off-peak hours to the extent practicable,
- Reroute construction trucks away from congested streets or sensitive receptor areas,
- Improve traffic flow by signal synchronization, and
- Ensure that all vehicles and equipment will be properly tuned and maintained according to manufacturers' specifications.

For additional measures to reduce off-road construction equipment, refer to the mitigation measure tables located at the following website:

www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html.

Fugitive Dust:

- Require the application of non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more),
- Install wheel washers where vehicles enter and exit the construction site onto paved roads or wash off trucks and any equipment leaving the site,
- Require all trucks hauling dirt, sand, soil, or other loose materials to be covered,
- Suspend all excavating and grading operations when wind gusts (as instantaneous gusts) exceed 25 mph,

- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation,
- When sweeping streets to remove visible soil materials use SCAQMD Rule 1186 and 1186.1 certified street sweepers or roadway washing trucks, and
- Replace ground cover in disturbed areas as quickly as possible.

VOC

- Use coatings and solvents with a VOC content lower than that required under SCAQMD Rule 1113,
- Construct or build with materials that do not require painting, and
- Require the use of pre-painted construction materials.

5. The lead agency identifies the SCAQMD Rule 403 – Fugitive Dust as a mitigation measure to address fugitive dust emissions from the proposed construction activities summarized in the project description, however, compliance with SCAQMD Rule 403 is required and should be clearly distinguished from measures that are intended to mitigate fugitive dust emissions beyond compliance with this regulation.

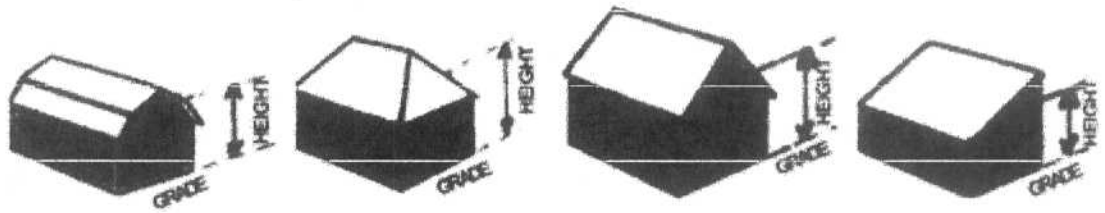
The mitigation measures for fugitive dust emissions should be specific and quantifiable. Also, SCAQMD staff recommends the following revisions to the proposed mitigation measures under II-1:

- Require the application of non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (i.e. previously graded areas inactive for ten days or more).
6. Given the position of the legislature on AB32, which states that global warming poses serious threats to the environment, and the position of the California Attorney General's office on global climate change, it is incumbent on the lead agency to analyze greenhouse gas (GHG) emissions from proposed projects and determine whether the proposed project will have a significant GHG impact. By not making a significance determination, the lead agency may be violating a fundamental requirement of CEQA to mitigation potentially significant adverse impacts.

Figure 15 - 5

Height of Buildings

SLOPED ROOF

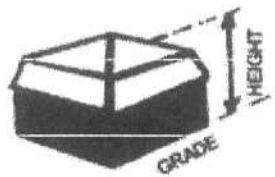


GAMBREL ROOF

HIP ROOF

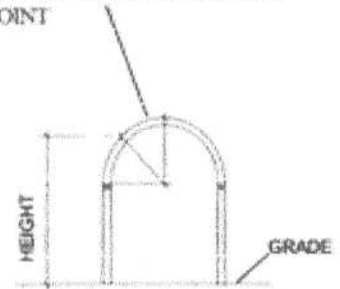
GABLE ROOF

SHED ROOF



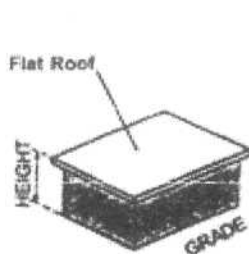
MANSARD ROOF

MEASURE LINEAR DISTANCE OF SURFACE AND FIND MID-POINT

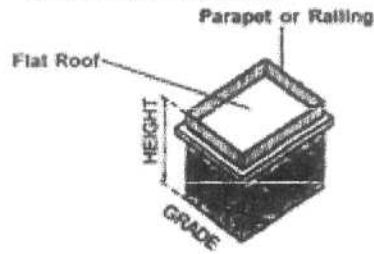


CURVED ROOF

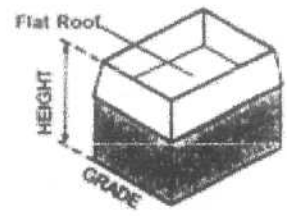
FLAT ROOF



FLAT ROOF



FLAT ROOF WITH RAILING



MANSARD PARAPET

21.52.271 Special group residence (board and care, convalescent home, half-way house, boardinghouse/lodginghouse, communal housing and the like).

The following conditions shall apply to special group residences including, but not limited to, board and care, convalescent home, half-way house, boardinghouse/lodginghouse and communal housing:

A. **Density.** In a residential zone, special group housing shall be limited to the density allowed by the underlying zone district multiplied by the number indicated in Table 52-2. In congregate care facilities, each bedroom with one or two (2) beds shall count as a unit when calculating density. In bedrooms with more than two (2) beds, each bed shall count as a unit. This shall be the maximum permitted density. The Planning Commission may require a lower density as the situation requires. In a nonresidential zone, density shall be limited to one unit per two hundred (200) square feet of lot area;

B. **Location.** In a residential district, no other similar facility may be in operation within one-half (1/2) mile of the proposed project site. If the use is a fraternity or sorority, the use shall be sufficiently isolated from other residential uses so as not to potentially disturb the neighborhood;

C. **Concerns.** Consideration of the conditional use permit shall address crime rate, concentration of similar uses, and the style and scale of the proposed building in relation to other buildings in the immediate vicinity;

D. **Continuation of Use.** The applicant shall provide evidence that the use will remain as that use applied for through deed restriction or other method suitable to the Planning Commission;

E. **Open Space.** Each facility shall provide not less than three hundred (300) square feet of common open space and one hundred fifty (150) square feet of usable open space per unit or room. Of the one hundred fifty (150) square feet, not less than fifty (50) square feet shall be private open space, and the remainder may be common open space added to the required three hundred (300) square feet of common open space;

F. **Public Transit Stop.** The facility shall be located within one thousand feet (1,000') by legal pedestrian route to a public transit stop; and

G. **Parking.** Parking and loading shall be provided as required by Chapter 21.41 (Off-Street Parking and Loading Requirements).

(Ord. C-6595 § 16, 1989; Ord. C-6533 § 1 (part), 1988).

Table 52-2

Density Multiples for Special Group Residences

Use	Density Multiple
Board and care home (limit of 50 beds)	2.0
Convalescent home (limit of 50 beds)	2.0
Boardinghouse/lodginghouse (limit of 50 beds)	2.0
Halfway house (limit of 50 beds)	2.0
Fraternity or sorority (limit of 50 beds)	2.0
Dormitory (limit of 50 beds)	2.0
Monastery, convent, communal housing, religious house (limit of 50 beds)	2.0

21.63.080 Waiver of development standards.

A. Criteria for Waiver. If the applicant can demonstrate that the increased density cannot physically be accommodated on the site, then the following development standards shall be waived during site plan review to accommodate the increased density. The waiver in the standards shall follow the priority order established and the applicant shall demonstrate that the increased density cannot be accommodated with each sequential waiver before the waiver of the next standard is allowed. Only one standard shall be waived unless it is shown that each individual standard waiver will not physically accommodate the proposed density. A complete site plan and floor plan shall be provided to demonstrate the physical noncompliance.

B. Priority order for waiver:

1. Percentage compact parking;
2. Tandem parking design limitations;
3. Privacy standards;
4. Private open space;
5. Common open space;
6. Height;
7. Distance between buildings;
8. Side yard setbacks;
9. Rear yard setbacks;
10. Number of parking spaces (but not less than one space per unit); and
11. Front setbacks.

(ORD-06-0045 § 1 (part), 2006; Ord. C-6822 § 20 (part), 1990).

21.63.090 Additional financial incentives.

If the developer believes that with the density bonus and the additional

incentives, the provision of the very low income, low income, moderate income condominiums, or senior citizen housing units are not financially feasible, then the developer shall submit a project pro forma demonstrating the deficiency. Such pro forma shall include the costs of complying with each of the above listed standards. These standards shall then be sequentially waived until financial feasibility is achieved.

21.41.221 On-site parking required--Residential uses.

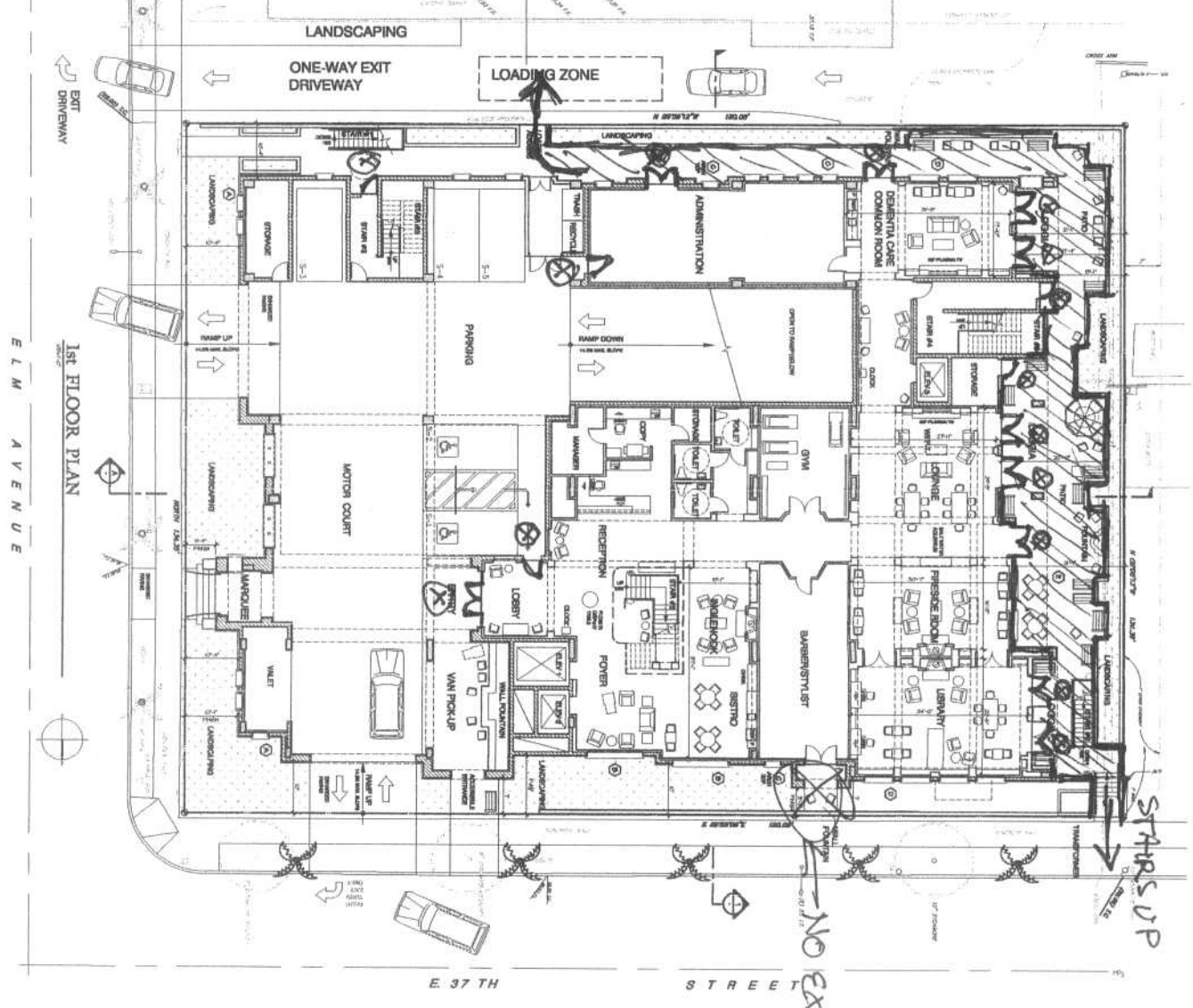
**Table 41-1B
Required Number of Parking Spaces for Special Residential Uses**

Use	Required Number of Spaces
1. Handicapped ^(a)	
-Low rent	1 space per each 2 bedrooms
-Market rent	1 space per each 1 bedroom
2. Senior citizen ^(a)	
-Low rent	1 space per each 2 bedrooms
-Market rent	1 space per each 1 bedroom
-Congregate care, low rent	1 space per each 2 bedrooms
-Congregate care, market rent	1 space per each 1 bedroom
3. Convalescent hospital	1.2 spaces per room, or 0.6 space per bed whichever is greater, plus 5 per 1,000 SF for medical office in building
4. Residential care facility	1 space per bed
5. Fraternity, sorority, dormitory	1 space per bed
6. Monastery, convent, communal, religious home and other special group residences	1 space per each 2 beds

- 1) PAINT EXTERIOR CEMENT PLASTER TO MATCH ASSISTED LIVING 3 - 5 FLOORS.
- 2) TEMPLE BRICK SIMILAR COLOR TO ASSISTED LIVING RUSTICATED MASONRY.
- 3) TEMPLE LANDSCAPING ALONG ELM AVENUE TO BE INTEGRATED WITH ASSISTED LIVING INCLUDING CANOPY TREES.
- 4) SIDE WALK ALONG ELM TO BE REPLACED.
- 5) EXISTING TEMPLE ENTRANCE STEPS TO BE REPAIRED AND FINISHED TO MATCH ASSISTED LIVING.

TEMPLE FACADE AND CAMPUS REMODEL:

DELIVERIES FOR TRUCKS GREATER THAN 12 IN HEIGHT PROVIDED IN NEW TEMPLE DRIVEWAY



- DESIGN, PRODUCTION AND DISTRIBUTION FEATURES:**
- 1.01. ALL WORK SHALL BE IN ACCORDANCE WITH THE CITY OF LOS ANGELES, CALIFORNIA, AND THE STATE OF CALIFORNIA, AND ALL APPLICABLE CODES AND REGULATIONS.
 - 1.02. ALL WORK SHALL BE IN ACCORDANCE WITH THE CITY OF LOS ANGELES, CALIFORNIA, AND THE STATE OF CALIFORNIA, AND ALL APPLICABLE CODES AND REGULATIONS.
 - 1.03. ALL WORK SHALL BE IN ACCORDANCE WITH THE CITY OF LOS ANGELES, CALIFORNIA, AND THE STATE OF CALIFORNIA, AND ALL APPLICABLE CODES AND REGULATIONS.
 - 1.04. ALL WORK SHALL BE IN ACCORDANCE WITH THE CITY OF LOS ANGELES, CALIFORNIA, AND THE STATE OF CALIFORNIA, AND ALL APPLICABLE CODES AND REGULATIONS.
 - 1.05. ALL WORK SHALL BE IN ACCORDANCE WITH THE CITY OF LOS ANGELES, CALIFORNIA, AND THE STATE OF CALIFORNIA, AND ALL APPLICABLE CODES AND REGULATIONS.
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 - 1.08. ALL WORK SHALL BE IN ACCORDANCE WITH THE CITY OF LOS ANGELES, CALIFORNIA, AND THE STATE OF CALIFORNIA, AND ALL APPLICABLE CODES AND REGULATIONS.
 - 1.09. ALL WORK SHALL BE IN ACCORDANCE WITH THE CITY OF LOS ANGELES, CALIFORNIA, AND THE STATE OF CALIFORNIA, AND ALL APPLICABLE CODES AND REGULATIONS.
 - 1.10. ALL WORK SHALL BE IN ACCORDANCE WITH THE CITY OF LOS ANGELES, CALIFORNIA, AND THE STATE OF CALIFORNIA, AND ALL APPLICABLE CODES AND REGULATIONS.

Figure 1
First Floor