

**CLARIFICATIONS AND REVISIONS TO THE CITY PLACE SKY LOFTS DEIR  
(STATE CLEARINGHOUSE NO. 2007041088)  
DURING THE PUBLIC REVIEW PERIOD**

This clarifications document consists of revisions to the City Place Sky Lofts Draft Environmental Impact Report (DEIR) to clarify inconsistencies in the document related to air quality. These clarifications are being distributed to persons/agencies on the original distribution list, including the State Clearinghouse, during the 45 day public review period which started on November 7, 2007 and ends on December 21, 2007. This review period will not change. Those parts of text that are underlined/crossed out indicate revisions to the text of the DEIR.

**EXECUTIVE SUMMARY**

**ES.6 SUMMARY OF ENVIRONMENTAL IMPACTS**

In Table ES-1, the first row under Summary of Impacts Related to Air Quality on pages ES-7 and ES-8 has been revised as shown below, to indicate that construction-level impacts related to air quality are less than significant following mitigation. A row has been added, as shown below, that indicates there is a significant operational air quality impact that cannot be mitigated to below a level of significance.

| POTENTIAL IMPACTS  | MITIGATION MEASURES  | LEVEL OF SIGNIFICANCE AFTER MITIGATION   |
|--|--|--|
| <b>Summary of Impacts Related to Air Quality</b>   |  |  |
| Implementation of the proposed project would result in construction-related air quality impacts. | AQ-1 All trucks hauling dirt, sand, soil or other loose materials off-site shall be covered or wetted or shall maintain at least two feet of freeboard (i.e., minimum vertical distance between the top of the load and the top of the trailer).   | <del>Significant short-term impact</del> |
|  | AQ-2 Streets shall be swept hourly if visible soil material has been carried onto adjacent public paved roads (reclaimed water shall be used if available.)  | Less than significant.                   |
|  | AQ-3 All active sites shall be watered at least twice daily.   |  |
|  | AQ-4 All grading activities that result in dust generation shall cease during second stage smog alerts and periods of high winds (i.e., greater than 25 miles per hour [mph]) if dust is being transported to off-site locations and cannot be controlled by watering.   |  |
|  | AQ-5 The developer shall use zero Volatile Organic Compounds (VOC) content architectural coatings during the construction of the project to the maximum extent feasible. This measure would reduce volatile organic compounds (VOC) [ROG] emissions by 95 percent over conventional architectural coatings. The following websites provide lists of manufacturers of zero VOC content coatings:<br><br><a href="http://www.aqmd.gov/business/brochures/zerovoc.html">http://www.aqmd.gov/business/brochures/zerovoc.html</a><br><a href="http://www.delta-institute.org/publications/paints.pdf">http://www.delta-institute.org/publications/paints.pdf</a><br><a href="http://www.cleanaircounts.org/factsheets/FS%20PDF/Low%20VOC%20Paint.pdf">http://www.cleanaircounts.org/factsheets/FS%20PDF/Low%20VOC%20Paint.pdf</a> |  |
|  | AQ-6 The project applicant will be required to name a construction relations officer to act as a community liaison concerning on-site construction activity, including resolution of issues related to dust generation from grading/paving activities.   |  |

| POTENTIAL IMPACTS  | MITIGATION MEASURES   | LEVEL OF SIGNIFICANCE AFTER MITIGATION |
|--|---|--|
| <b>Summary of Impacts Related to Air Quality</b>   |   |  |
| <u>Implementation of the proposed project would result in operational air quality impacts.</u> | <u>There are no mitigation measures that would reduce these operational air quality impacts to a level that is less than significant.</u> | <u>Significant operational impact.</u> |

**4.3 AIR QUALITY**

**4.3.6 LEVEL OF SIGNIFICANCE AFTER MITIGATION RELATED TO AIR QUALITY**

The first paragraph in this section has been revised as shown below to indicate that construction-related impacts are less than significant following mitigation.

The proposed project would result in air pollutant emissions in exceedance of construction and operational thresholds established by the SCAQMD. During the construction phase of the project, ROG would exceed the construction phase thresholds established by the SCAQMD. ~~and would result in a significant adverse short term regional air quality impact. These ROG emissions are almost entirely due to architectural coatings and cannot be mitigated to below a level of significance unless the coating application is extended over time thereby delaying building completion.~~ However, implementation of mitigation measure AQ-5 that requires the use of zero VOC content architectural coatings to the extent feasible would reduce ROG emissions by 95 percent over conventional architectural coatings. This would result in an ROG emission level of less than 21 pounds per day, which would be below the 75 pound per day SCAQMD significance threshold for construction activities shown previously in Table 4.3-5. Therefore, air quality impacts related to construction would be less than significant following mitigation.

**SECTION 8.0 UNAVOIDABLE ADVERSE IMPACTS**

**SECTION 8.2.2 AIR QUALITY**

The first paragraph in this section has been deleted as shown below because construction-related air quality impacts are less than significant following mitigation.

~~As described in Section 4.3 (Air Quality), implementation of the proposed project would result in air pollutant emissions in exceedance of construction and operational thresholds established by the South Coast Air Quality Management District (SCAQMD). During the construction phase of the project, compliance with existing regulations would reduce reactive organic gases (ROG) emissions from the application of architectural coatings during construction to levels below the SCAQMD daily construction emission thresholds. Therefore, construction of the proposed project would not result in short term adverse ROG emissions. However, nitrogen oxide (NO<sub>x</sub>) emissions from construction vehicle exhaust would continue to exceed the SCAQMD emissions threshold and would represent an unavoidable significant adverse construction impact of the proposed project related to air quality.~~

The second paragraph in this section has been revised as shown below to be consistent with the significant operational air quality impacts described in Section 4.3.

During the operation of the project, compliance with existing regulations would minimize odor emissions. However, project operations would result in emissions of carbon monoxide (CO), NO<sub>x</sub>, and ROG which would exceed the operational phase thresholds established by the SCAQMD which cannot be mitigated to below a level of significance and which would constitute an unavoidable significant adverse impact of the proposed project related to air quality both on a project level and a cumulative level.