



South Coast Air Quality Management District

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FAXED: JUNE 8, 2005

June 8, 2005

Mr. Andres L. Soto, Planning Manager
City of Colton, Community Development Department
650 N. La Cadena Drive
Colton, CA 92324

**Draft Negative Declaration for the Proposed DM Sanborn Development's Tentative
Parcel Map No. 17186 and Two Industrial Buildings Totaling 34,990 square feet
(File Text Number DAP- 000-403)**

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 Negative Declaration (MND).

Please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final Mitigated Negative Declaration. The AQMD would be happy 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.

Sincerely,

Steve Smith, Ph.D.
Program Supervisor
Planning, Rule Development & Area Sources

Attachment

SS:GM

SBC050520-01
Control Number

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1. URBEMIS 2002 Version 7.5.0 Output Sheets

Based on the project description, there should be construction emission estimates under the Phase 2: Site Grading. The URBEMIS 2002 output sheets do not show emission estimates for phase 2 (site grading) of the 2.3 acre site, including off- and on-road vehicles and equipment combustion emissions, fugitive dust, etc. Similarly, phase 3 construction does not include equipment combustion exhaust emissions. The most likely reason for the lack of emission estimates for the phase 2 and 3 construction scenarios is that the lead agency overlooked activating the defaults for the construction equipment mix. To activate phase 2 construction equipment, first, go to the main construction window form and click on the circle next to "User Override." Step 2, move the cursor to the left and click once on the box next to "Phase 2: Site Grading." Step 3, click on any tab labeled "Equip Exhaust" 1,2 or 3. Step 4, at the bottom click on the button labeled "Recalc with Land Uses." To activate phase 3 construction equipment, go back to the main construction window and click on the box next to "Phase 3: Building." Then follow steps 3 and 4 above. Don't forget to click on the button labeled "OK Apply Changes." This process will activate phase 2 and 3 construction equipment. Before finalizing the negative declaration, it is recommended that the lead agency perform this operation to ensure that phase 2 and 3 construction emissions do not exceed applicable significance thresholds.

2. The analysis of air quality impacts should include the influence of complying with SCAQMD Rule 403 – Fugitive Dust. This can be done by going to the main construction window. Under "Mitigation Measures" click on the box next to "Phase 2: Mitigation. Move your cursor to the right and click on the box labeled "Water exposed surfaces – 2x daily."
3. In the Transportation/Circulation Section XV a. through b., the lead agency discusses transportation impacts and the payment of traffic impacts fees to cover unspecified roadway impacts and the payment of traffic impacts fees to cover unspecified roadway improvements to prevent significant traffic impacts to the local street system. The lead agency then concludes that traffic impacts are less than significant considering the 244 average daily trips as negligible.

Mr. Andres L. Soto,
Planning Manager

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First, the number of vehicle trips per day in the Transportation/Traffic section is substantially less than the number of vehicle trips reported in the URBEMIS 2002 output file, 244 versus 921. Please reconcile this discrepancy in the Final ND. If the higher traffic estimate is the correct number, it is recommended that the lead agency perform an intersection capacity utilization analysis or quantify traffic effects using other approved methodologies.

The quantification of the existing traffic effects, the proposed traffic impacts and the impacts from the mitigation measures is important because the results may warrant performing a CO hotspots analysis. The SCAQMD recommends performing the CO hotspots analysis if the volume to capacity ratio increases by two percent or more as a result of a proposed project for intersections rated D or worse.

Should the lead agency, after estimating the proposed project's traffic impacts, believe that a CO hotspots analysis is warranted, please refer to the most current Cal Trans guidance regarding performing a CO hotspots analysis. This information can be obtained at the following internet address:

<http://www.dot.ca.gov/hq/env/air/coprot/htm> .