



South Coast Air Quality Management District

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FAXED: JUNE 21, 2005

June 21, 2005

Mr. Andres L. Soto
City of Colton
Community Development Department
659 North La Cadena Drive
Colton, CA 92324

**Negative Declaration for Design Review, CUP, Major Variance, Uniform
Sign Program and Environmental Assessment for Proposed
Saddleback RV**

Dear Mr. Soto:

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 in the Final Negative Declaration.

Please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Negative Declaration. The SCAQMD would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Charles Blankson, Ph.D., Air Quality Specialist – CEQA Section, at (909) 396-3304 if you have any questions regarding these comments.

Sincerely

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

Attachment

SS:CB

SBC050608-01
Control Number

**Negative Declaration for Design Review, CUP
(Saddleback RV)**

1. **URBEMIS 2002, Project Emissions:** Although the lead agency used the URBEMIS 2002 model to estimate project emissions, a model approved for this use by the SCAQMD, a review of the URBEMIS 2002 output sheets, attached to the Negative Declaration, shows that the lead agency simply ran the URBEMIS model with only the land use input data entered into the model. For example, there is no information in the project description or data in the output sheets relating to whether or not there are any buildings on the site that need to be demolished (phase 1) before construction can begin, and what type and number of equipment will be used to demolish these buildings. Furthermore, there is also no information on the type and number of equipment, either off-road or on-road, that will be used to grade the site (phase 2) before construction. Consequently, the output sheets do not show any emission estimates for grading the 4.85 acre-site. There is similarly no data or emissions during phase 3 when actual building construction takes place.

For explicit instructions on activating the defaults for construction equipment, see the SCAQMD's 06/08/05 comment letter on the Sanborn development project.

Without the input of any such information or the assumptions underlying the data used, the lead agency cannot conclude that the project's impacts will not be significant. SCAQMD staff recommends that the lead agency rerun the URBEMIS 2002 with the relevant input data. If the model results show that project emissions will exceed the significance thresholds, the lead agency is required to recommend mitigation measures to reduce the project impacts to less than significant.

2. **Project Mitigation:** The following mitigation measures are recommended for the lead agency to consider should project construction or operational impacts exceed the significance thresholds.
- Water active grading sites, unpaved roads or exposed surfaces at least twice daily.
 - Trucks hauling dirt, sand, gravel or soil are to be covered or shall maintain at least two feet of freeboard in accordance with Section 23114 of the California Vehicle Code.
 - Sweep nearby or adjacent streets at the end of the day if visible soil material is carried over from construction site.
 - Use electric- or natural gas-powered equipment in lieu of gasoline or diesel-powered engines. However, where diesel equipment has to be used because there are no practical alternatives, the construction contractor should use particulate filters, oxidation catalysts and low sulfur diesel, as defined in SCAQMD Rule 431.2, i.e., diesel with less than 15 ppm sulfur content.
 - Use electricity from power poles instead of temporary diesel- or gasoline-powered generators.

- Use light-colored roofing materials in construction to deflect heat away from buildings thus reducing energy consumption.
- Use double-paned windows to reduce thermal loss in buildings.
- Use architectural coatings with a lower VOC content than 100 grams per liter as required by revised SCAQMD Rule 1113.
- Install automatic lighting on/off controls and energy-efficient lighting.
- Landscape with appropriate drought-tolerant species to reduce water consumption.

Other mitigation measures can be found in Chapter 11 of the SCAQMD 1993 CEQA Air Quality Handbook that the lead agency may consider implementing.