



South Coast Air Quality Management District

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FAXED: March 10, 2005

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

**Negative Declaration for the Proposed Moss Equipment Rentals (Design Review,
General Plan Amendment from Medium Residential to Light Industrial, Zone
Change from R-2 to M-1, Conditional Use Permit for Fuel Tanks, Environmental
Assessment, File Index No. DAP-000-373)**

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 Final Negative Declaration.

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final Negative Declaration. The SCAQMD staff 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, CEQA Section
Planning, Rule Development & Area Sources

SS:GM

Attachment
SBC050218-02
Control Number

Negative Declaration for the Proposed Moss Equipment Rentals (Design Review, General Plan Amendment from Medium Residential to Light Industrial, Zone Change from R-2 to M-1, Conditional Use Permit for Fuel Tanks, Environmental Assessment, File Index No. DAP-000-373)

1. In Section III. Air Quality a) on page 15, the lead agency based its conclusion that construction and operational air quality impacts would be insignificant by using the screening tables in Chapter 6 of the SCAQMD's CEQA Air Quality Handbook (Handbook). The SCAQMD has not supported the use of the Handbook Land Use screening tables for a number of years because those screening tables were derived using an old version of the on-road mobile source emission factor model, EMFAC7EP, and trip rates are based on an old version of the Institute of Traffic Engineers Trip Generation Manual. As a result of relying solely on those tables, instead of quantifying air quality impacts, the lead agency has not demonstrated that project air quality impacts are less than significant. Therefore, the SCAQMD recommends that the lead agency demonstrate that project impacts are less than significant in the Final ND by estimating short- and long-term air quality impacts using the current CARB URBEMIS 2002 emissions model or following the calculation methodologies in Chapter 9 and the Appendix to Chapter 9 in the Handbook in the Final ND. The URBEMIS 2002 emissions model can be accessed at <http://www.arb.ca.gov/planning/urbemis/urbemis2002/urbemis2002.htm> . In the event any air quality impacts are concluded to be significant, feasible mitigation measures should be identified and, if available, implemented by the project proponent.
2. In the Final ND, the lead agency should discuss the influence of complying with SCAQMD Rule 403 – Fugitive Dust and Rule 402 – Nuisance.
3. Because the proposed dealership will have gasoline dispensing equipment the lead agency should cite compliance with SCAQMD Rule 461 - Gasoline Transfer and Dispensing in the Final ND.
4. Because the proposed project includes gasoline tanks and dispensing equipment, the SCAQMD is a responsible agency and the project is subject to the discretionary permit authority of the SCAQMD. Without quantitative analysis of environmental impacts from the proposed project, the ND is not adequate for the purposes of subsequent discretionary approvals by the SCAQMD. Further, the SCAQMD may pursue actions identified in CEQA Guidelines § 15096(e) to ensure that a quantitative analysis is prepared for the proposed project.