



# South Coast Air Quality Management District

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FAXED: MAY 31, 2005

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Mr. Dan Bott, Environmental Coordinator  
City of Santa Ana  
Planning & Building Agency  
P.O. Box 1988, M-20  
Santa Ana, CA 92702

## **Draft Mitigated Negative Declaration for the Proposed Shea Homes Development**

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 Mitigated Negative Declaration (Final MND).

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

Attachment

SS:GM

ORC050428-01  
Control Number

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1. In Section III. Air Quality b-d) on pages 6-9, 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 MND 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. Should the lead agency, after final review (see comment #1), determine that the short-term (construction) air quality impacts from the proposed project are estimated to exceed established daily significance thresholds for volatile organic compounds (VOC), and the criteria pollutants including carbon monoxide (CO), sulfur dioxide (SO<sub>2</sub>), nitrogen oxide (NO<sub>x</sub>), and particulate matter with an aerodynamic diameter less than 10 microns (PM<sub>10</sub>), the SCAQMD recommends that the lead agency consider modifying the following mitigation measures and adding additional mitigation measures to further reduce construction air quality impacts from the project, if applicable and feasible:

The following additional mitigation measure is recommended to reduce VOC emissions:

- Use low VOC coatings and solvents.

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The following changes are recommended for the mitigation measures identified in the Draft MND to reduce fugitive dust:

2. All clearing and earthwork activities shall cease during periods of high winds (winds greater than 25 mph ~~averaged over one hour~~ as instantaneous gusts) or during Stage 1 or Stage 2 smog alerts.
3. Streets surrounding the project site ~~should~~ shall be cleaned at the end of each day of construction (recommend SCAQMD Rule 1186 approved water sweepers with reclaimed water).
5. All material transported offsite shall ~~either be sufficiently watered or securely covered to prevent excessive amounts of dust.~~

The following is a list of additional recommended mitigation measures to further reduce fugitive dust:

- Replace ground cover in disturbed areas inactive for (the lead agency should specify a period of time, for example: ten days or more).
- Apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more).

The following is a list of additional recommended mitigation measures to further reduce construction-related vehicle and equipment exhaust emissions:

- Prohibit truck idling in excess of ten minutes.
- Configure construction parking to minimize traffic interference.
- Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow.
- Schedule construction activities that affect traffic flow on the arterial system to off-peak hour to the extent practicable.
- Reroute construction trucks away from congested streets or sensitive receptor areas.
- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site.
- Use electricity from power poles rather than temporary diesel generators.

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- Give preferential consideration to contractors who use clean fuel construction equipment; emulsified diesel fuels; construction equipment that uses low sulfur diesel and is equipped with oxidation catalysts, or other retrofit technologies, etc.
3. The transportation/traffic discussion in Section XV. on page 32 indicates that the lead agency is relying on the Traffic and Circulation Study prepared by the City of Santa Ana in March 2001 (Appendix D) to determine traffic impacts. On page 35, the lead agency further indicates that the proposed project would result in a net decrease in the number of vehicle trips during daily and peak hours compared with the previous land use, an office building, concluding that traffic impacts would be less than significant. The lead agency support demonstrate its findings by including the traffic study documentation including the levels of service and volume to capacity ratio impacts for the affected project intersections near the proposed project site. In addition, VMT assumptions made in the traffic analysis should be consistent with the VMT used in the air quality analysis.

The lead agency also should also indicate how long the site has been vacant. If the site has been vacant for an extended period of time, credit should not be given for the effects of a past project.

After reviewing the results of the traffic study, if the lead agency should then determine and discuss in the final document whether potential traffic impacts on the levels of service at the intersections described in the initial study would warrant a CO hot spots analysis. The lead agency is reminded that all for all intersections affected by the proposed project, a CO hot spots analysis is recommended to be performed for all intersections that experience a volume to capacity increase of 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> .