



South Coast Air Quality Management District

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

Draft Mitigated Negative Declaration for the Proposed Empire Homes Project

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.

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final Mitigated 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 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

SBC060110-07
Control Number

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Construction Emission Estimates

1. In the URBEMIS 2002 computer model output sheets included with the mitigated negative declaration, the lead agency did not include an input for total land use area to be developed and maximum acreage disturbed per day. Without this information, the model is unable to calculate fugitive dust generated by the proposed project. As a result, fugitive dust during the site preparation appears to be substantially underestimated. The lead agency needs to input the total acres disturbed or maximum acreage disturbed per day and rerun the model to produce a more accurate estimate of fugitive dust generated during site preparation.
2. According to the URBEMIS output sheets included with the mitigated negative declaration, site preparation is to be done using only one grader and construction is to be done using only one "other equipment." Based on SCAQMD construction site surveys, projects of this size would use three or more pieces of equipment for both site preparation and construction, such as tractors, loaders, backhoes, etc. Therefore, if the lead agency is unsure of the exact construction equipment mix during site preparation and construction, the URBEMIS model should be rerun and the model's default equipment mixes should be used to more accurately characterize off-road construction equipment exhaust and fugitive dust emissions.