



# South Coast Air Quality Management District

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**FAXED: JUNE 22, 2006**

June 22, 2006

Mr. John F. Signo  
City of Carson  
Planning Division  
701 East Carson Street  
P. O. Box 6234  
Carson, CA 90749

Dear Mr. Signo:

## **Mitigated Negative Declaration for the Watson Land Co. Bldg. No. 220 (DOR 935-06)**

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 Mitigated Negative Declaration.

Please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Mitigated Negative Declaration. The SCAQMD would be available 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

LAC060609-02  
Control Number

**Mitigated Negative Declaration (MND) for the  
Watson Land Co. Bldg. No. 220 (DOR 935-06)**

1. **Applicable Air Quality Plans:** On page 5 of the MND the lead agency states that the proposed project will not conflict or obstruct applicable air quality plans. However, the lead agency provides no rationale or data to support this conclusion. Please provide the data or rationale to support this conclusory statement.
  
2. **Project Air Quality Emissions:** The lead agency states on page five of the MND that “construction activities associated with the proposed project would result in the temporary emissions of CO, SO, VOCs and PM10 from construction vehicles and equipment.” The project may also result in the creation of stationary point source emissions due to chemicals handled onsite and will generate new employee vehicle-trips, and shipping and supply truck deliveries which could hinder efforts to improve regional and local air quality. The lead agency concludes that appropriate mitigation measures will be implemented to reduce air quality impacts to less than significant. The lead agency provides no data on the emissions from the above sources.

Please note that without quantifying air quality impacts from the proposed project, the lead agency has not demonstrated that the proposed project’s air quality impacts will not be significant after mitigation. To quantify potential emissions from construction and operation of the proposed project, it is recommended that the lead agency use the analysis methodologies in the SCAQMD’s 1993 CEQA Air Quality Handbook (Handbook) or other approved methodologies. Alternatively, the lead agency may consider using California Air Resources Board (CARB) computer model URBEMIS 2002 to estimate the project’s construction and operational emissions. The model can be obtained at the SCAQMD website: [www.aqmd.gov/ceqa/models.html](http://www.aqmd.gov/ceqa/models.html). If quantification of emissions reveals that the project’s emissions exceed the established significance thresholds, then mitigation measures must be required by the lead agency to reduce those emissions to less than significance.

2. **Diesel Truck Emissions:** The proposed project is expected to generate 390 vehicle trips per day, of which up to 160 would be truck trips. With the designation of diesel particulates as a carcinogen by the CARB, the SCAQMD typically requests that the health impacts of diesel particulates from truck traffic be assessed, using a methodology that can be accessed at the SCAQMD website at: [www.aqmd.gov/ceqa/handbook/diesel\\_analysis.doc](http://www.aqmd.gov/ceqa/handbook/diesel_analysis.doc) under Health Risk Assessment Guidance.

Because the nearest sensitive receptor is located approximately 2,000 feet from the proposed project site, a mobile source health risk assessment is not necessary. The lead agency, however, should consider potential future toxic health risks for sensitive receptor projects that may be located in the vicinity of the currently proposed project. If there are future sensitive receptor projects proposed for siting in the vicinity of the

proposed project, it is recommended that the lead agency follow the recommendations in CARB's Air Quality and Land Use Handbook: A Community Health Perspective located at the following CARB web site: [www.arb.ca.gov/ch/landuse.htm](http://www.arb.ca.gov/ch/landuse.htm).

3. **Mitigation Measures:** If construction or operational air quality impacts from the proposed project are concluded to be significant, the following measures are recommended for the lead agency to consider where applicable or feasible:
- Maintain equipment and vehicle engines in good condition and in proper tune as per manufacturers' specifications.
  - Require the use of alternative clean fuel such as compressed natural gas-powered equipment with oxidation catalysts instead 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 sulfur content of 15 ppm by weight or less. The low-sulfur diesel has the potential to reduce NO<sub>x</sub> emissions by 50 percent.
  - Require the use of aqueous or emulsified diesel fuel for all construction equipment. Aqueous diesel formulations have received interim verification by the CARB and show a reduction of 16% in NO<sub>x</sub> and 60% in PM10 from diesel exhaust. Information of aqueous diesel formulations can be found at the following websites: [www.arb.ca.gov/diesel/FAQ.htm#6](http://www.arb.ca.gov/diesel/FAQ.htm#6) , [www.enginecontrolsystems.com](http://www.enginecontrolsystems.com)
  - Use electricity from power poles instead of from temporary diesel- or gasoline-powered generators.
  - Trucks hauling dirt, sand, gravel or soil are to be covered or should maintain at least two feet of freeboard in accordance with Section 23114 of the California Vehicle Code.
  - Pave parking areas and construction access roads to the main roads to avoid dirt being carried on to the roadway.
  - Restrict idling emissions by using auxiliary power units and electrification.
  - Enforce truck parking restrictions.
  - Restrict truck traffic on some routes.
  - Redirect truck route to avoid residential areas or schools.
  - Improve traffic flow through signal synchronization.
  - Provide electrical sources for service equipment and docking of trucks.
  - Use light-colored roof materials to deflect heat.
  - Install solar panels on roof to supply electricity for air conditioning.
  - Use double-paned windows to reduce thermal loss.
  - Install central water heating systems to reduce energy consumption, and
  - Install energy-efficient appliances to reduce energy consumption.

Other mitigation measures for consideration by the lead agency can be found in Chapter 11 of the SCAQMD CEQA Handbook.