



South Coast Air Quality Management District

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June 29, 2005

Mr. Gary L. Koontz, Community Development Director
City of Grand Terrace
Community Development Department
22795 Barton Road
Grand Terrace, CA 92313

Draft Mitigated Negative Declaration (MND) for the Proposed Project Title SA-05-06 and E-05-04

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. As a potentially responsible agency for the proposed project (page 2 of the Environmental Checklist form), the SCAQMD finds that the MND does not provide quantitative construction or operational air quality information. As a result, the SCAQMD cannot rely on this MND as the CEQA document for any permit application received by the SCAQMD for this project.

The SCAQMD requests that the lead agency revise the MND by quantifying construction and operational air quality impacts and recirculate the document pursuant to CEQA Guidelines §15073.5. 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

Draft Negative Mitigated Declaration (MND) for the Proposed Project Title SA-05-06 and E-05-04

Short and Long Term Air Quality Impacts

1. The lead agency has concluded on page 12 in Section V. Air Quality of the Draft Mitigated Negative Declaration (Draft MND) that the proposed project will have less than significant air quality impacts. The lead agency did not, however, support its conclusion by quantifying the proposed project's construction and operational air quality impacts. The SCAQMD therefore recommends that for this current project and for future projects that the lead agency quantify short- and long-term air quality impacts. This is important because although the proposed construction activities are temporary in nature, existing land uses to the south and to the east of the proposed site are single family and pre-existing residences. If these surrounding sensitive receptors are less than one-quarter mile from the proposed site, they may be exposed to emissions from fugitive dust, off- and on-road vehicles and equipment, architectural coatings and other emission sources associated with the construction and operation of the proposed project. This information is also important for the SCAQMD, as a responsible agency, because SCAQMD permit engineers rely on the CEQA document when processing subsequent permit applications submitted by the project proponent. Therefore, the MND should be revised and recirculated pursuant to CEQA Guidelines §15073.5 to include construction and operational emission estimates, emission factors, methodologies and control efficiencies for the proposed mitigation measures. This information could be included in the Final MND in a table, as part of the narration or as an appendix.

To quantify air quality impacts, the lead agency can utilize the current CARB URBEMIS 2002 emissions model, which can be accessed at <http://www.arb.ca.gov/planning/urbemis/urbemis2002/urbemis2002.htm> or follow the calculation methodologies in Chapter 9 and the Appendix to Chapter 9 in the South Coast AQMD's CEQA Air Quality Handbook.

In the event that quantification of the air quality impacts from the proposed project, either construction and/or operational, exceed established significance thresholds, mitigation measures may be necessary. In addition to the lead agency's identification of feasible mitigation measures on page 12, the lead agency should also specify the control efficiency of each mitigation measure (if one is available) and apply the control efficiency to the total emissions estimated for the project. In this way the lead agency can quantitatively determine the significance of air quality impacts from the proposed project.

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Short and Long Term Air Quality Impacts, cont.

2. On pages 12 and 13, the lead agency in Section V.(b) defines sensitive receptors in its General Plan Air Quality Element “as schools, hospitals, convalescent homes and nursing homes” therefore stating that the closest sensitive receptor, Grand Terrace Elementary School, is about one-half mile southeast of the proposed project site. In Chapter 5 of the SCAQMD CEQA Air Quality Handbook (Handbook), the SCAQMD includes residences in its definition of sensitive receptors because residences can be occupied by small children, the elderly and people who might have heart or lung conditions that potentially could be aggravated by a project’s short- and long-term air quality impacts. Therefore, the SCAQMD recommends that the lead agency amend its definition of sensitive receptors both in its General Plan Air Quality Element and in the revised MND. The lead agency should also include in the revised MND the distances from the residences to the project site described as surrounding land uses on page one of the Draft MND.
3. The analysis of air quality impacts should also include the influence of complying with SCAQMD Rule 403 – Fugitive Dust.

Traffic Impacts

4. Under Services – Traffic/Access on pages 13 and 14 of the Draft MND, the lead agency includes project estimates for daily contractor truck, heavy-duty delivery truck and employee vehicles in the Draft MND but does not include even summarized findings by the lead agency of the levels of service and volume to capacity ratio impacts for the affected project intersections near the proposed project site or the significance thresholds used by the lead agency to determine that traffic impacts are less than significant. In addition, VMT assumptions made in the traffic analysis should be consistent with the VMT used in the air quality analysis.

The traffic is important relative to air quality because it will determine whether or not a CO hot spots analysis should be prepared. 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.

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Traffic Impacts, cont.:

4. 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> .

Mitigation Measures – Construction:

5. In the event that the lead agency's air quality analysis shows that any criteria pollutant emissions exceed the SCAQMD's daily significance thresholds, the SCAQMD recommends that the lead agency consider modifying the following mitigation measures for construction impacts on page 12 and adding the following mitigation measures to further reduce fugitive dust (PM10) and oxides of nitrogen (NOx) impacts from the project, if feasible:

Recommended Changes:

1. Appropriate dust control measures shall be integrated into the grading plans and activities. (The lead agency should list the specific mitigation measures it intends to apply to reduce fugitive dust from grading and other site preparation activities);
2. Water trucks will be available during all grading activities to control dust generation (state the frequency of the watering, e.g. twice daily, etc.);
3. Dust control measures shall be taken including the use of "clean" street sweepers to sweep for all paved roads, driveways and access points during hours of operation including the access easement from Terrace Avenue to the project to prevent visible soil from being carried onto adjacent public paved roads (recommend water sweepers with reclaimed water);

Recommended Additions:

- Apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more).
- Replace ground cover in disturbed areas as quickly as possible

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Mitigation Measures - Construction, cont.:

Recommended Additions, cont.:

- Install wheel washers where vehicles enter and exit the construction site onto paved roads or wash off trucks and any equipment leaving the site each trip.
- Use electricity from power poles rather than temporary diesel or gasoline power generators;
- Use low sulfur diesel for construction equipment.
- Configure construction parking to minimize traffic interference.
- Prevent trucks from idling longer than five minutes;
- 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.
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation.