



# South Coast Air Quality Management District

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**FAXED: OCTOBER 28, 2005**

October 28, 2005

Mr. Stanley Smalewitz  
City of Commerce  
Community Development Commission  
2535 Commerce Way  
Commerce, CA 90040

**Draft Program Environmental Impact Report (DPEIR) for  
The Telegraph Road Corridor Revitalization Project  
(September 2005)**

Dear Mr. Smalewitz:

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 Program Environmental Impact Report.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Program Environmental Impact Report. The SCAQMD would be happy 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

LAC050920-04  
Control Number

**Draft Program Environmental Impact Report (DPEIR) for  
The Telegraph Road Corridor Revitalization Project**

1. **Project Emissions Support Data Missing:** Although the lead agency used URBEMIS 2002, a model originally developed by the California Air Resources Board (CARB) and recommended for use by SCAQMD to analyze air quality impacts from land use projects, the URBEMIS output spreadsheets were not included in the DPEIR. Omitting this technical information delayed the SCAQMD's review of the air quality analysis and limits the public's ability to review the data and confirm the tables showing the proposed project's air quality impacts. The URBEMIS spreadsheets were provided SCAQMD staff upon request. The lead agency should include this supporting data in the Final Program EIR. The SCAQMD requests that for all future CEQA documents prepared by the lead agency, that all supporting technical air quality data, including model outputs, spreadsheets, etc., be provided along with the draft document.
  
2. **Mitigation for NO<sub>x</sub> Construction Emissions:** The lead agency states on page 59 of the DPEIR that even with full incorporation of identified feasible mitigation measures, short-term peak emissions of NO<sub>x</sub> could remain above the SCAQMD daily significance threshold. In addition to the three mitigation measures identified by the lead agency on page 58, SCAQMD recommends the following additions.
  - Regarding the use of "low-sulfur diesel for construction equipment and diesel particulate filters for diesel equipment and trucks," SCAQMD staff recommends that construction contractors use alternative clean fuel such as electric or compressed natural gas-powered construction 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 contractors should use low-sulfur diesel, as defined in SCAQMD Rule 431.2, i.e., diesel with a 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.

Other recommended NO<sub>x</sub> mitigation measures are to:

- Use aqueous or emulsified diesel fuel for construction equipment. Aqueous diesel fuels have received interim verification by the California Air Resources Board and show a reduction of 16 percent in NO<sub>x</sub> and 60 percent in PM10 from diesel exhaust.
- Use electricity from power poles instead of temporary diesel- or gasoline-powered generators.
- Require the use of newer, lower-emitting trucks to transport construction workers as well as equipment and material to and from construction sites.
- Limit the hours of operation of one or more pieces of construction equipment.

3. **Mitigation for Operational Emissions:** Although Table 13 on page 29 of the DPEIR shows that operational ROG, NO<sub>x</sub> and CO emissions will exceed the significance thresholds, the lead agency proposes minimal mitigation. The lead agency states on page 32 that apart from promoting a pedestrian environment which includes access for public transit and locating entertainment uses and retail within close proximity to each other, “No additional feasible mitigation strategies are currently available to substantially reduce vehicle emissions.”

SCAQMD staff recommends the following mitigation measures for consideration by the lead agency:

- Synchronize traffic lights on streets impacted by proposed projects.
- Use light-colored roofing materials to deflect heat from buildings.
- Install central water heating systems to reduce energy consumption.
- Install energy efficient appliances, such as water heaters, furnaces and boiler units.
- Install solar panels on roofs to supply electricity for air conditioning.
- Install automatic lighting on/off controls and energy-efficient lighting.
- Use double-paned windows to reduce thermal loss in buildings.