



South Coast  
Air Quality Management District  
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E-Mailed: November 10, 2010  
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Ms. Lysa Gaboudian  
County Sanitation Districts of Los Angeles County  
P.O. Box 4998  
Whittier, CA 90607-4998

**Review of the draft Negative Declaration (ND) for the  
Union Street Trunk Sewer Section One Project**

The South Coast Air Quality Management District (AQMD) 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 revised or final CEQA document as appropriate.

The AQMD staff is concerned that the lead agency had failed to demonstrate that that the proposed project will have no significant air quality impacts absent quantification of criteria pollutant emissions, odorous emissions, and greenhouse gas emissions from the proposed project. Without quantifying air quality impacts from the project, the lead agency is unable to support its conclusion that the project will have insignificant air quality impacts. Therefore, AQMD staff requests that the lead agency quantify potentially significant adverse air quality impacts and revise the CEQA document as appropriate.

AQMD staff is available to work with the lead agency to address these air quality issues and any other questions that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,

A handwritten signature in black ink that reads "Ian V. MacMillan". The signature is written in a cursive, slightly slanted style.

Ian MacMillan  
Program Supervisor, CEQA Inter-Governmental Review  
Planning, Rule Development & Area Sources

Attachment

[IM:DG](#)

LAC101013-01  
Control Number

### Quantification of Regional Construction Emissions

1. On page four of the ND the lead agency states that all air quality impacts from the project are less than significant; however, the lead agency did not quantify construction related emissions from the proposed project. As a result, the lead agency has failed to demonstrate that the project's regional air quality impacts are less than significant. Therefore, the AQMD staff recommends that the lead agency identify all air pollutant sources and potential air quality impacts related to the project in the revised or final CEQA document. Specifically, AQMD staff recommends the lead agency calculate air quality impacts from the project's construction activities including emissions from the use off-road construction equipment (e.g., cranes and tractors) on-road mobile sources (e.g., construction worker vehicle trips and material transport trips) and other area sources (e.g., architectural coatings).

The AQMD adopted its CEQA Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. AQMD staff recommends that the lead agency use this Handbook as guidance when preparing its revised air quality analysis. Copies of the Handbook are available from the AQMD's Subscription Services Department by calling (909) 396-3720. Additionally, the lead agency may be able to use the URBEMIS 2007 Model. This model is available on the AQMD Website at: [www.aqmd.gov/ceqa/models.htm](http://www.aqmd.gov/ceqa/models.htm).

### Quantification of Regional and Localized PM2.5 Emissions

2. As part of the analysis recommended in comment #1 above, AQMD staff also recommends analyzing PM2.5 emissions. The AQMD staff has developed a methodology for calculating PM2.5 emissions from construction activities. In connection with developing PM2.5 calculation methodologies, AQMD staff has also developed both regional and localized significance thresholds. The AQMD staff requests that the lead agency quantify PM2.5 emissions and compare the results to the recommended PM2.5 significance thresholds. Guidance for calculating PM2.5 emissions and PM2.5 significance thresholds can be found at the following internet address: [http://www.aqmd.gov/ceqa/handbook/PM2\\_5/PM2\\_5.htm](http://www.aqmd.gov/ceqa/handbook/PM2_5/PM2_5.htm).

### Localized Construction Emission Impacts

3. The proposed project is in a highly urbanized area, therefore, if the lead agency determines that any sensitive land uses (i.e., schools and schoolyards, parks and playgrounds, day care centers, nursing homes, hospitals, and residential communities) surround the project site AQMD staff recommends calculating localized air quality impacts in addition to analyzing regional air quality impacts (see comments #1 and #2). The results from the localized air quality analysis should be compared the localized significance thresholds (LSTs). LSTs can be used in addition to the recommended regional significance thresholds to indicate whether ambient air quality standards are exceeded locally when preparing a CEQA document. The unsubstantiated findings on page 4 of the ND made by the lead agency are insufficient for evaluating localized air quality impacts, therefore, the AQMD staff requests that the lead agency quantify localized impacts by either using the LSTs

developed by the AQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at:

<http://www.aqmd.gov/ceqa/handbook/LST/LST.htm>.

#### Quantification of Greenhouse Gas (GHG) Emissions

4. On page eight of the ND the lead agency relies on a previous CEQA document for a different project to determine the greenhouse gas (GHG) emissions impacts from the proposed project. Absent a project specific GHG analysis AQMD staff is concerned that the lead agency has failed to substantiate that GHG impacts are insignificant from the proposed project. Further, AQMD staff would like to remind the lead agency that Section 15064.4 of the CEQA guidelines requires that the lead agency “make a good faith effort” to quantify the GHG emissions impacts from the proposed project. Given that the lead agency has completed several projects similar to the proposed it is likely that the lead agency’s staff has adequate technical information (e.g., type of construction equipment, hours of equipment operation, material delivery trips and energy consumption) to calculate the GHG emissions impacts from the proposed project. Therefore, AQMD staff requests that the revised CEQA document include a quantitative analysis of greenhouse gases, a determination of significance, and, if necessary, feasible mitigation measures.

#### Air Quality Mitigation Measures

5. In the event that the lead agency’s revised CEQA document requested in comments #1 through #4 demonstrates significant adverse air quality impacts the AQMD staff recommends that the lead agency require mitigation pursuant to Section 15370 of the CEQA Guidelines that could minimize or eliminate significant air quality impacts. To assist the lead agency with identifying possible mitigation measures for the project, please refer to Chapter 11 of the AQMD CEQA Air Quality Handbook for sample air quality mitigation measures. Also, a list of mitigation measures can be found on the AQMD’s CEQA webpage at the following internet address:  
[www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.htm](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.htm)

Additionally, AQMD’s Rule 403 – Fugitive Dust, and the Implementation Handbook contain numerous measures for controlling construction-related emissions that should be considered for use as CEQA mitigation if not otherwise required.

#### Odor Impacts

6. The lead agency states that minimal odors will be released from the project during the connection of the proposed sewer line to the existing sewer line. Based on this statement the duration and intensity of the odor release from the proposed project isn’t clear. Therefore, AQMD staff requests that the lead agency provide additional information on the potential odor impacts from the proposed project in the revised or final CEQA document. Also, in the event that the lead agency determines in the revised or final CEQA document that there are significant air quality impacts from odors released at the project site the AQMD staff recommends that the lead agency

provide mitigation in accordance with Section 15370 of CEQA guidelines to minimize or eliminate odors from the proposed project.

Applicable Regulatory Measures

7. On page nine of the ND the lead agency states that a small portion of the project will be constructed through the outermost edge of a long-inactive landfill. However, the lead agency does not acknowledge or state that the project will comply with AQMD Rule 1150-Excavation of Landfill Sites. Therefore, AQMD staff recommends that the lead agency address compliance with Rule 1150 in the revised or final CEQA document.