



South Coast
Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

BY-E-MAIL: OCTOBER 1, 2008

October 1, 2008

Ms. Andrea Gilbert, Associate Planner
Community Development Department
City of Chino
13220 Central Avenue
Chino, CA 91710

**Draft Environmental Impact Report (Draft EIR) for the Proposed SRG Chino
South Industrial Park**

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 Environmental Impact Report.

Pursuant to Public Resources Code Section 21092.5, please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final Environmental Impact Report. 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
Program Supervisor – CEQA Section
Planning, Rule Development & Area Sources

Attachment

SS:GM

SBC080815-02
Control Number

Construction Air Quality Analysis

1. Table 5.3-8 (Short-Term Construction Emissions (Without Mitigation) -2009 and Table 5.3-10 (Short-Term Construction Emissions (With Mitigation) -2009 show emissions that are not consistent with the URBEMIS2007 computer output sheets in the air quality assessment.

In the air quality assessment appendix, the URBEMIS output sheets show 148 pounds per day of mitigated PM10 emissions during the mass grading phase, but Table 5.3-10 shows 59 pounds per day of mitigated PM10 emissions. The URBEMIS output sheets also show 32 pounds per day of mitigated PM2.5 emissions during the mass grading phase, but Table 5.3-10 only shows 17 pounds per day. In the Final EIR, Table 5.3-10 should be revised so that the results in the URBEMIS output sheets are consistent with the results in Table 5.3-10.

2. In the URBEMIS2007 computer model output sheets on pages four and five, the lead agency changed the default emission rate of 20 pounds per acre per day of PM10 fugitive dust for mass grading and fine grading to 10 pounds per acre per day. In the URBEMIS2007 Version 9.2 User's Guide in Appendix A on page A-6 under footnote 1, the California Air Resources Board (CARB) has concluded that the 10 pounds per acre per day emissions factor represents PM10 emissions with watering. Since the 10 pounds per day emission factor already includes PM10 reduction of approximately 50 percent, the lead agency should not switch on watering as a mitigation measure in the model because this would result in double counting PM10 emission reductions from watering. As a result, PM10 and PM2.5 emissions in Table 5.3-10 should be revised in the Final EIR.

Construction Mitigation Measures

3. Because the lead agency has determined that short-term (construction) air quality impacts from the proposed project are estimated to exceed established daily significance thresholds for volatile organic compounds (VOC), nitrogen oxide (NO_x), and possibly particulate matter (PM10 and PM2.5 – see comment #2), the SCAQMD recommends that the lead agency consider modifying the following mitigation measures and adding additional mitigation measures to further reduce construction air quality impacts from the project, if applicable and feasible:

Recommended changes:

The following changes are recommended for Mitigation Measure AQ-1 to reduce fugitive dust:

Prior to grading and construction of the Project, the Project proponent shall provide a Fugitive Dust Control Plan to the City of Chino and a Large Operation Notification to the Executive Officer of the South Coast Air Quality Management District based on SCAQMD Rule 403(c)(21) and (e). The Fugitive Dust Control

Plan that describes the application of standard best management practices to control dust during construction. Best management practices include:

- Application of non-toxic soil stabilizers according to manufacturers' specifications in inactive areas inactive for ten days or more.
- During all construction activities, construction contractors shall sweep onsite and offsite streets if silt is carried to adjacent public thoroughfares, to reduce the amount of particulate matter on public streets (recommend street sweepers with reclaimed water).

Recommended additions:

PM 10 (Fugitive Dust)

- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation;
- Apply water three times daily, or non-toxic soil stabilizers according to manufacturers' specifications, to all unpaved parking or staging areas or unpaved road surfaces; and
- Pave road and road shoulders.

NO_x

- Alternative fueled off-road equipment;
- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site;
- 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; and
- Improve traffic flow by signal synchronization.

VOC

- Construct/build with materials that do not require painting; and
- Use pre-painted construction materials.

Operational Emissions

4. In the analysis of operational air quality impacts on pages 45.3-29 of the Draft EIR, the lead agency calculates on-road mobile source emissions by using a weighted one-way trip length of 21 miles. Although the lead agency provides information on the passenger vehicle trip length, 13 miles, no other information is included, such as

heavy-duty truck trip lengths, calculations, assumptions, etc., so SCAQMD staff would not confirm whether or not the weighted trip length of 21 miles is appropriate.

5. On page 5.3-29 in the Draft EIR, the lead agency states that the heavy-duty truck trip length is based on travel from the facility to the boundary of the Basin (no trip length provided). If the heavy-duty trucks go no further than the boundary of the Basin, this assumption may be appropriate. If the heavy-duty trucks go to destinations beyond the boundary of the Basin, the lead agency should calculate all emissions that occur within California as required by CEQA. Any emissions that occur outside of the Basin, but within California would then be compared to applicable significance thresholds in those jurisdictions through which the heavy-duty trucks travel.

Operational Mitigation Measures

6. Since the lead agency has determined that project operational air quality impacts are estimated to exceed the recommended SCAQMD daily significance thresholds for VOC, NO_x, CO, PM₁₀ and PM_{2.5}; the SCAQMD recommends the lead agency consider the following additional mitigation measures to reduce operational emissions including diesel particulates, if applicable and feasible:
 - Provide minimum buffer zone of 300 meters between truck traffic and sensitive receptors;
 - Improve traffic flow by signal synchronization;
 - Enforce truck parking restrictions;
 - Develop park and ride programs;
 - Restrict operation to “clean” trucks;
 - Provide onsite services to minimize truck traffic in or near residential areas, including, but not limited to, the following services: meal or cafeteria service, automated teller machines, etc.;
 - Require or provide incentives to use particulate traps on heavy-duty diesel trucks; and
 - Use alternative fueled off-road equipment, if used.