



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Mitigated Negative Declaration (MND) for the Proposed Sunflower Residential Neighborhood Project

South Coast Air Quality Management District (SCAQMD) staff 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 MND.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to construct 184 residential units on 15.95 acres (Proposed Project). The Proposed Project is located on the northwest corner of Foothill Boulevard and Spruce Avenue in the City of Rialto. Construction is expected to take approximately 400 days¹.

SCAQMD Staff's Summary of Air Quality Analysis

In the Air Quality Analysis section, the Lead Agency quantified the Proposed Project's construction and operational emissions and compared those emissions to SCAQMD's recommended regional air quality CEQA significance thresholds. Based on the analyses, the Lead Agency found that the Proposed Project's regional construction and operational air quality impacts would be less than significant. Additionally, the Lead Agency quantified the Proposed Project's localized construction and operational emissions and compared those emissions to SCAQMD's Localized Significance Thresholds (LSTs) look-up table for the five-acre LSTs with the receptor distance at 25 meters in Source Receptor Area (SRA) 34². Based on the analysis, the Lead Agency found that Proposed Project's localized air quality impacts would be less than significant.

Regional Air Quality Impact Analysis – Construction-related VOC Emissions

Based on a review of the main body of the MND, SCAQMD found that the Proposed Project's VOC emissions during construction would be 50.84 pounds/day (lbs/day)³. However, according to the CalEEMod output files in Appendix A of the MND, the Proposed Project's VOC emissions from construction activities would be 76.07 lbs/day⁴. This exceeds SCAQMD's recommended regional air quality CEQA significance threshold at 75 lbs/day for construction for VOC emissions⁵, and feasible mitigation measures are required to mitigate or avoid the significant adverse air quality impact (CEQA Guidelines Sections 15070 and 15071(e)). If the significant adverse air quality impact from construction-related VOC emissions cannot be mitigated or avoided, the Lead Agency shall prepare a Draft EIR and certify a Final EIR prior to approving the Proposed Project (CEQA Guideline Section 15073.5(d)).

¹ MND. Table A: *Tentative Project Construction Schedule*. Page 29.

² *Ibid.* Page 31.

³ *Ibid.* Table C. Page 30.

⁴ MND. Appendix A: CalEEMod Printouts. CalEEMod Winter and Summer Runs. Page 4 of 27.

⁵ South Coast Air Quality Management District. CEQA Significance Thresholds. Accessed at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>.

Therefore, SCAQMD staff recommends that the Lead Agency clarify if the Proposed Project's construction activities would exceed SCAQMD's recommended regional air quality CEQA significance threshold for VOC emissions and include feasible mitigation measures, as needed, in the Final MND.

Localized Significance Thresholds (LSTs) Impact Analysis

In the Air Quality Analysis section, the Lead Agency stated that “[b]ased on the SCAQMD recommended methodology and the construction equipment planned, the maximum daily disturbed acreage is assumed to be approximately 12.69 acres⁶.” Subsequently, the Lead Agency used the LSTs mass rate look-up table for the five-acre LSTs with the receptor distance at 25 meters in SRA 34⁷. To justify the use of the LSTs mass rate look-up table for five acres, the Lead Agency used the land use size comparison data in the CalEEMod User Guide and determined that the estimated size of the emission sources for the SCAQMD's estimated 5-acre project area would be equivalent to an approximately 218,000-square foot general office park, which would generate an average of 2,490 vehicle trips per day⁸. Since the Proposed Project is expected to generate 1,487 vehicle trips per day, and the operational emissions are calculated assuming 1,510 vehicle trips per day, the Lead Agency found that using the look-up table for a five-acre LSTs is appropriately conservative and would represent a “worst-case” scenario⁹.

SCAQMD staff is concerned with the LSTs methodology. First, the LSTs mass rate look-up tables are recommended for use for projects that are less than or equal to five acres. While Lead Agencies are not precluded from performing project-specific modeling for projects that are less than or equal to five acres for more precise modeling results, it is recommended that Lead Agencies perform project-specific air quality modeling for larger projects. Second, the LSTs mass rate look-up tables for construction activities are based on frequently used construction equipment in addition to other factors such as, but not limited to, daytime atmospheric conditions. SCAQMD staff disagrees with using the average daily vehicle trips for the general office park land use type defined by CalEEMod to determine the appropriate LSTs for comparison to determine the level of significance. Since the maximum daily disturbed acreage is assumed to be approximately 12.69 acres based on the construction equipment planned for the Proposed Project, and it is larger than five acres, SCAQMD staff recommends that the Lead Agency perform project-specific dispersion modeling to analyze the Proposed Project's LSTs in the Final MND. . Alternatively, to be consistent with the LSTs analysis assumptions, SCAQMD staff recommends the Lead Agency limit the maximum daily disturbed acreage to five acres, and include this limit as an air quality mitigation measure in the Final MND.

Recommended Mitigation Measure to Reduce VOC Emissions during Construction

In the event that the Lead Agency finds, after revising the Air Quality Impact Analysis, that the Proposed Project's construction-related VOC emissions would be significant, SCAQMD staff recommends incorporating the following recommended mitigation measure or other comparable measures in the Final MND to reduce VOC emissions during construction. Mitigation measure(s) that the Lead Agency proposes to mitigate construction-related VOC emissions to be less than significant must be fully enforceable through permit conditions, agreements, or other legally binding instruments (CEQA Guidelines Section 15126.4(a)(2)). As such, it is recommended that the Lead Agency include the following recommended mitigation measure or other comparable measures in applicable construction bid document, contract, and/or development agreement prior to issuance of a building and grading permit for the Proposed Project.

Mitigation Measure Air Quality-1: Use of water-based or low VOC products.

⁶ MND. Page 31.

⁷ *Ibid.*

⁸ *Ibid.* Footnote 1.

⁹ *Ibid.*

Conclusion

Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process. Please provide SCAQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, response should provide sufficient details giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful or useful to decision makers and the public who are interested in the Proposed Project.

SCAQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Alina Mullins, Assistant Air Quality Specialist, at amullins@aqmd.gov or (909) 396-2402, should you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS:AM

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