



South Coast Air Quality Management District

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GrandAveWidening-FirstToFourth@santa-ana.org

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Draft Environmental Assessment (Draft EA) for the Proposed Grand Avenue Widening Project (First Street to Fourth Street)

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 Final EA. In the project description, the lead agency proposes to widen Grand Avenue from First Street to Fourth Street in Santa Ana. The street widening would increase Grand Avenue from two to three lanes in each direction including some turn pockets, some installation of landscaping, and other improvements including full and partial acquisitions of up to eleven commercial properties.

Although the Draft EA includes the aforementioned project description, the project description and air quality analysis lack specific details that would help the general public, agencies and others interested in reviewing the project's air quality impacts. Specifically, the lead agency describes the partial and full removal of up to eleven commercial properties but does not include the total or daily amount of area that would be demolished, the total and daily amount of debris removed, the number of daily truck trips that would be involved in the removal, the location of the disposal site, etc. The Draft EA also provides a general description of the widening project stating that the project would include increasing the number of traffic lanes along Grand Avenue, adding turn pockets, bus turnouts, etc. but omits construction details like the total and daily area disturbed (the length and width of the street widening, etc.) equipment lists, etc. Without this basic information, reviewing agencies, the general public and other stakeholders cannot determine how much fugitive dust and vehicle exhaust from grading, debris removal, truck trips, equipment operating at the site, etc., will impact sensitive receptors near the project site or project impacts regionally. The AQMD Air Quality Analysis Handbook (Handbook) describes the degree of specificity and level of technical detail that should be presented prior to determining significance. Due to this lack of information included in the Draft EA, the lead agency has not demonstrated that all project air quality impacts are less than significant. In the following attachment, the AQMD staff recommends that the following project air quality impacts be quantified and compared with

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recommended thresholds of significance to determine whether project construction impacts are less than significant.

Please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final EA. The AQMD staff is available to work with the lead agency to address these issues and any other air quality 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,



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

IM:GM

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Control Number

Regional and Localized Construction Air Quality Impacts

1. In the Draft EA, the lead agency has analyzed air quality impacts including daily project operational PM_{2.5} and PM₁₀ impacts and localized CO impacts for 1-hour and 8-hour standards. AQMD staff is concerned, however, that the lead agency does not include a quantified estimate of emissions from construction activities for this project. Without quantifying emissions, the lead agency has not demonstrated that impacts are less than significant.

The AQMD staff recommends that the lead agency include regional and localized construction air quality impacts in the Final EA. Guidance for existing air quality models that can assist in estimating regional air quality impacts can be found on the AQMD CEQA website.¹ Resources available to calculate these emissions include the Roadway Construction Emissions Model from the Sacramento Metropolitan AQMD and/or the calculation methodologies in Chapter 9 and the Appendix to Chapter 9 in the South Coast AQMD's CEQA Air Quality Handbook.²

The AQMD staff also recommends that the lead agency evaluate localized construction air quality impacts since it is noted in Figure 2 of the Draft EA and upon aerial map inspection, that possible residences to the west of Grand Avenue and the Remington Elementary School located on East Fourth Street are located within a quarter mile from the Grand Avenue project site. Therefore, AQMD staff requests that the lead agency evaluate localized air quality impacts³ to ensure that any nearby sensitive receptors located within one-quarter mile of the project site are not adversely affected by the project's construction activities.

Compare Air Quality Impacts With Thresholds of Significance

2. AQMD staff recommends that the lead agency use thresholds of significance to determine the significance of any project air quality impacts. This would include thresholds that the lead agency develops, publishes, and adopts itself or utilizes from previously adopted thresholds of significance that other public agencies have developed provided that the decision to use such thresholds is supported by substantial evidence. AQMD staff encourages the lead agency to use the thresholds of significance that the AQMD has developed for projects within its jurisdiction and that are available on the AQMD website.

Construction Mitigation Measures

3. In the event that the lead agency's revised EA demonstrates significant adverse air quality impacts the AQMD staff recommends that the lead agency require mitigation that could minimize or eliminate these impacts to a less than significant level.⁴
4. On page 2-79, the lead agency includes AIR-1 as a mitigation measure that states, "Implementation of applicable and feasible control measures as provided in South Coast Air Quality Management District (SCAQMD) Rule 403 are recommended

during construction activities capable of generating fugitive dust.” The lead agency is reminded that complying with a rule, regulation, law, etc., should not be considered as mitigation if it is required. Instead, the effects of complying with a rule, e.g., Rule 403 should be part of the project description and incorporated into the project-specific impact calculations.

1 AQMD’s CEQA website can accessed at <http://www.aqmd.gov/ceqa/> .

2 The SCAQMD CEQA Air Quality Analysis Handbook is available from SCAQMD Subscription Services by calling (909) 396-3720. Supplementary guidance is also available on the SCAQMD website at: <http://www.aqmd.gov/ceqa/hdbk.html> .

3 Localized Significance Thresholds guidance can be found at: <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>

4 Mitigation measure suggestions can be found at http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html