



South Coast Air Quality Management District

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SENT VIA USPS AND ELECTRONIC MAIL:

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460 North Euclid Avenue
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Draft Mitigated Negative Declaration (Draft MND) for the Proposed Cucamonga Creek Wash Repair

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document as a commenting agency. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final Mitigated Negative Declaration.

In the project description, the lead agency proposes to repair the existing crosswalls used for water conservation in Cucamonga Creek. The project involves the excavation and relocation of approximately 200,000 cubic yards of aggregate material followed by crushing, sorting, and exporting the material off-site. The lead agency intends to use portable aggregate crushing and screening equipment for approximately five years. The SCAQMD staff has concerns regarding compliance with local rules and regulations as well as the assumptions used in the air quality analysis, which might have underestimated the air quality impacts. Please see the attachment for more information.

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final MND. SCAQMD staff is available to work with the Lead Agency to address these issues and any other air quality questions that may arise. If you have any questions regarding this letter, please contact me at jcheng@aqmd.gov or call me at (909) 396-2448.

Sincerely,

Jillian Wong

Jillian Wong, Ph.D.

Program Supervisor

Planning, Rule Development & Area Sources

JW:JC

SBC150630-19

Control Number

Attachment

Attachment

Applicable Rules and Regulations

In the Project Description of the Draft MND, the lead agency intends to use portable aggregate crushing and screening equipment for approximately five years. The Final MND should include a discussion on how the project will comply with the following Rules and Regulations.

California Code of Regulations

1. Article 5 – Section 2450 – 2465 – The statewide program for the registration and regulation of portable engines and equipment units (Portable Equipment Registration Program – PERP) would not be applicable. The engine or equipment unit may not meet the definition of portable as defined in section 2452 of this regulation. Due to the scope of work and length of the project, the lead agency would be required to obtain local district permits for aggregate equipment and operations.

SCAQMD Rules

2. The Final MND should include a discussion on how the project will comply with the following SCAQMD Rules:
 - a. Rule 201 – Permit to Construct – The lead agency should obtain written authorization for the construction/installation of any equipment that may cause or control air contaminants. If there are permit questions concerning the aggregate processing equipment, they can be directed to Engineering and Compliance Staff at (909) 396-2315. The SCAQMD should be identified as a responsible agency under CEQA.
 - b. Rule 203 – Permit to Operate – The lead agency should obtain a written permit to operate. If there are permit questions concerning the aggregate processing equipment, they can be directed to Engineering and Compliance Staff at (909) 396-2315. The SCAQMD should be identified as a responsible agency under CEQA.
 - c. Rule 403(e) – Additional Requirements for Large Operations – The project will disturb an area greater than 50 acres. The lead agency states that 200,000 cubic yards of aggregate material is equivalent to 41.31 acres, but does not provide any supporting documentation of this claim. Additionally, the lead agency should also include any surface areas that is disturbed or traveled on as a result of this project. The lead agency should discuss and provide additional details on how the project will comply with Rule 403(e).
 - d. Rule 1157 - PM10 Emission Reduction From Aggregate and Related Operations – The lead agency should discuss and provide additional details on how the project will comply with Rule 1157.

Air Quality Analysis

3. The lead agency estimates that aggregate material will be hauled approximately 10 miles because “aggregate material is heavy and relatively expensive to haul.” SCAQMD staff recommends providing additional details and locations on haul lengths that can be verified and supported by documentation and distances. The air quality impacts should be re-analyzed using the appropriate trip lengths.

4. During Excavation and Crosswall activity it is unclear how the lead agency arrived at 85 loads per day and 15,000 total trips since 200,000 cubic yards (300,000 tons) of aggregate is expected to be relocated.

Based on 20 cubic yards per truck, this would result in approximately 10,000 one-way trips or 20,000 round trips. This discrepancy should be clarified in the Final MND.

$200,000 \text{ cu yds of aggregate} / 20 \text{ cu yds per truck} = 10,000 \text{ one-way truck trips}$

$7 \text{ months} \times 26 \text{ days} = 182 \text{ working days.}$

$20,000 \text{ round trip trucks} / 182 \text{ days} = 110 \text{ trucks per day}$

Based on 20 tons per truck, this would result in approximately 15,000 one-way trips or 30,000 round trips. This discrepancy should be clarified in the Final MND.

$300,000 \text{ tons of aggregate} / 20 \text{ tons per truck} = 15,000 \text{ one-way truck trips}$

$7 \text{ months} \times 26 \text{ days} = 182 \text{ working days.}$

$30,000 \text{ round trip trucks} / 182 \text{ days} = 272 \text{ trucks per day}$

5. Operational emissions were not analyzed in the Draft MND. Section 1.F of the Technical Appendices states that the project is not a source of long-term operational emissions. The project is expected to last five years and is considered a long-term project. SCAQMD staff recommends conducting an operational air quality analysis and comparing emissions to SCAQMD operational thresholds.
6. The SCAQMD staff is concerned that the existing sensitive receptors will be exposed to significant regional and localized operational impacts, mostly from the daily truck activities that will likely operate using diesel fuel. Sensitive receptors living next the proposed Project site that are exposed to emissions from on-site truck activities (entering the site, queuing before loading and unloading and exiting the site) and sensitive receptors along the truck routes will also be exposed to diesel particulate matter emissions that are determined by the California Air Resources Board (CARB) to be carcinogenic (something that is directly involved in causing cancer).

Based on information in the Draft MND the entire proposed project site is essentially located within 1,000 feet of existing sensitive receptors: single-family residences east and west of the proposed project. As a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land-use decision making process, the California Air Resources Board (CARB) has provided the CARB Air Quality and Land Use Handbook (CARB Land Use Handbook). Based on guidance from the CARB Land Use Handbook, CARB recommends a buffer of at least 1,000 feet between land uses that will have 100 or more trucks per day.¹

Since the proposed project is expected to generate more than 100 truck trips per day and the proposed haul route is approximately 100 feet east of the nearest residential sensitive receptor. SCAQMD staff recommends that the lead agency conduct a mobile source health risk assessment (HRA)² to disclose the potential health risks to the residents from vehicles that use the truck routes.

¹ CARB Air Quality and Land Use Handbook: <http://www.arb.ca.gov/ch/handbook.pdf>. Guidance is for siting new sensitive land uses within 1,000 feet of a distribution center, Page 4. The buffer is a neutral mitigation measure provided to minimize truck activity emission impacts to sensitive receptors.

² "Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis" Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>