



South Coast Air Quality Management District

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

E-MAILED: OCTOBER 29, 2010

October 29, 2010

Mr. David Chantarangsu, AICP dchantarangsu@ci.glendora.ca.us
Assistant Planning Director
Department of Planning and Redevelopment
City of Glendora
116 East Foothill Boulevard
Glendora, CA 91740

Draft Mitigated Negative Declaration (Draft MND) for the Proposed Monrovia Nursery Specific Plan

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 CEQA document.

In the project description, the lead agency proposes the construction of 124 minimum 20,000 square foot detached single family residential lots on approximately 95 acres. In addition, the lead agency states that grading will include 357,000 cubic yards of cut and 353,000 cubic yards of fill balanced on-site. In the air quality analysis, the lead agency has estimated construction impacts using the URBEMIS2007 land use computer model and compared those estimates with the AQMD recommended daily regional thresholds of significance. From the modeling inputs, however, it appears that the lead agency did not estimate the project impacts from the cut and fill activities. As this activity will likely generate substantial dust and diesel emissions from heavy duty equipment, these impacts should be estimated and included in the Final EIR.

In addition to evaluating the above-mentioned air quality impacts, the AQMD recommends that the lead agency estimate localized air quality impacts to ensure that any nearby sensitive receptors are not adversely affected by the construction activities that are occurring in close proximity. It is noted under surrounding land uses and in an aerial map inspection that the proposed project is located within one-quarter mile of sensitive receptors (residential properties) surrounding the proposed project. AQMD guidance for performing a localized air quality analysis can be found on the AQMD web page.¹ Should the lead agency conclude after its analyses that construction or operational localized air quality impacts exceed the AQMD daily significance thresholds, staff has compiled mitigation measures that can be implemented if the air quality impacts are determined to be significant.²

¹ <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>

² http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html

Finally, on page 37 of the Draft EIR, the lead agency has noted that contaminated soils were detected on the project site during the completion of a Phase I Environmental Site Assessment. In the event that construction activities disturb soil that has the potential to be classified as a hazardous waste, (e.g., petroleum hydrocarbons, etc.) contaminated sites would be subject to SCAQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil and that compliance should be referenced in the Final MND.

Please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. 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,



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

IM:GM

LAC100930-02
Control Number