



South Coast Air Quality Management District

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

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Mr. Paul Toor, P.E., Director, ptoor@ci.south-pasadena.ca.us
Public Works Department
City of South Pasadena
1414 Mission Street
South Pasadena, CA 91030

Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) for the Proposed Garfield Reservoir Replacement Project

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 Mitigated Negative Declaration.

In the project description, the lead agency proposes to demolish the existing 6.25-million gallon (MG) reservoir and pump station. The lead agency then proposes to construct two new reservoirs with a combined capacity of 6.50 MG along with a pump station, inlet/outlet vault, rechlorination room, and a water distribution support yard on the project site. It is estimated that the demolition activities would result in the removal of approximately 4,300 cubic yards (cy) of concrete, roofing and framing material debris. This would require an estimated 327 total truck haul trips to remove the debris off site or approximately 16 truck trips per day. Site preparation would then occur and include about 7,000 cy of soil export resulting in approximately 550 truck trips. Approximately 18,000 cy of soil import is also needed resulting in approximately 1,350 total truck trips. The total number of truck trips to support earthwork activities (soil export/import) is therefore estimated to be 1,900 total truck trips or about 30 truck trips per day (an average of 3-4 trucks per hour). The demolition and soil disturbance phases would not overlap. The proposed construction would begin in the fall of 2013 and take approximately 18 months to complete.

In the Draft IS/MND, the lead agency estimated regional air quality impacts and compared those emissions with the AQMD recommended daily significance thresholds. The AQMD staff recommends that the lead agency include the methodologies, equations, emission factors, any modeling performed, etc., used to estimate construction emissions for all construction phases (demolition, soil disturbance, building construction, etc.) and all applicable analyses in the Final MND. This supporting documentation can be included in the Final MND as a table footnote, in the narration or as an appendix.

Finally, it is noted under surrounding land uses on page 4 and in an aerial map inspection that the proposed project is located within one-quarter mile of sensitive receptors: residential properties north, south and west of the proposed site and Blair High School to the east. The AQMD staff therefore recommends that the lead agency evaluate 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. SCAQMD guidance for performing a localized air quality analysis can be found at the following web address: <http://www.aqmd.gov/ceqa/handbook/LST/LST.html> . Should the lead agency conclude after its analyses that construction air quality impacts exceed the SCAQMD localized daily significance thresholds, staff has compiled mitigation measures to be implemented if the air quality impacts are determined to be significant. Mitigation measure suggestions can be found at http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html

Please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. The SCAQMD staff would 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

Attachment

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