



South Coast Air Quality Management District

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E-MAILED: NOVEMBER 16, 2010

November 16, 2010

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Response to Comments for the 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. The AQMD is responding to the staff report for Agenda Item #2 for the Glendora Planning Commission Meeting scheduled for Tuesday, November 16, 2010. Page 33 of the staff report responds to the comments sent by the AQMD to the lead agency on October 29, 2010 regarding the Draft MND for the Monrovia Specific Plan. AQMD staff feels that this response does not address the air quality concerns raised in our letter, and is inadequate. As the lead agency currently does not have enough information to determine if impacts from this project are less than significance, it should revise its air quality analysis based on the following comments prior to certifying the Final MND.

The AQMD staff is concerned that the lead agency did not address the localized impacts from the grading that will include 357,000 cubic yards of cut and 353,000 cubic yards of fill balanced on-site. These impacts are separate from the regional impacts and the localized 1-hour and 8-hour impacts from carbon monoxide (CO hotspots analysis). The AQMD recommends that localized air quality impacts from onsite equipment and fugitive dust generated during soil disturbance should be quantified and then compared with appropriate localized thresholds of significance in order to demonstrate that the residential sensitive receptors located surrounding the project site will not be adversely impacted by these project emissions. 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

The AQMD staff is also concerned that the lead agency did not address regional project impacts from the cut and fill activities in its comments because it appears that the lead agency did not estimate the project impacts from the cut and fill activities in the Draft MND. 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 CEQA document.

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

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

Finally, the AQMD staff notes that since nursery growing operations ceased in 2007 and only caretaker operations have been conducted at the site since 2007, it is inappropriate for the CEQA document to take credit for past on-going emissions since the previous project baseline emissions would not continue if the proposed project was not constructed and operated. The AQMD staff also believes that it is also inappropriate to take credit for emissions from the past project smudge pot operations since the use of smudge pots has been banned within the South Coast Air Quality Management's jurisdiction since the 1970s. As smudge pot emissions make up the vast majority of the emission 'credits' claimed in the 2007 air quality report, reliance on these credits is insufficient for a CEQA analysis. Therefore, project construction and operation emission impacts should be estimated and compared with applicable thresholds of significance to determine project significance rather than using past emissions as credits to determine that project impacts are less than significant.

The SCAQMD 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
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LAC100930-02
Control Number