



November 14, 2016

Justina G. Arce
City Planner
121 W 5th Street
Holtville, CA 92250
justina@theholtgroup.net

SUBJECT: Early Consultation for Melon Properties LLC Annexation, General Plan
Amendment and Pre-Zone

Dear Ms Arce:

The Imperial County Air Pollution Control District (Air District) received the "Early Consultation for Melon Properties LLC Annexation, General Plan Amendment and Pre-Zone", also known as the Project. The proposed project includes the annexation of approximately 8.19 acres of undeveloped land that will house the development of an apartment complex consisting of 168 units including on-site recreation center and storm-water retention facilities. The reviewing process by the Air District includes the most current rules and regulations of the Air District, the California Environmental Quality Act (CEQA), the most current CEQA Air Quality Handbook for Imperial County (ICCEQA) and the Air District non-attainment status. Currently, the non-attainment status for ozone, our "serious" non-attainment status for PM₁₀ and our "moderate" non-attainment status for PM_{2.5} are the driving criteria in establishing the thresholds for NO_x, ROG, PM₁₀, SO_x and CO. These thresholds and their significance are explained within the pages of the ICCEQA. In particular, the Melon Properties LLC proposed project as described will need to perform a preliminary Air Quality analysis. A Preliminary Air Quality Analysis helps in support of the development of an Initial Study that properly discloses potential environmental impacts and their associated mitigations.

While this is not a thorough analysis please keep in mind that all phases including construction and operations should be reviewed for potential impacts. The analysis should include short and long term emissions as well as daily and yearly emission calculations. All temporary construction and grading impacts should quantify fugitive dust and combustion emissions and propose mitigation measures. When project commence close to existing sensitive receptors it may be necessary for a health risk assessment such as a diesel exhaust screening level.

When projects locating near already existing facilities with the potential to emit toxics should have a health risk assessment conducted in a similar way. The relative human exposure, location of the project, distance to sensitive receptors all should be considered when

developing the risk assessment. Although this is a preliminary analysis there should be a brief discussion on the cumulative impact that may occur as a result of this project. All mitigation measures should follow CEQA and District Rules and Regulations, this includes a brief discussion of Rule 310 Operational Development Fee and those rules regulating fugitive emissions. The entire rule book for the Imperial County can be found at <http://www.imperialcounty.net> under "Air Pollution." We encourage all developers, construction companies, cities and interested parties to obtain a copy of the newly proposed Regulation VIII, Fugitive Dust Control. Should you have any questions please do not hesitate to call.

Sincerely,



Monica N. Soucier
APC Division Manager