

**Additional MBARD Letter on the Tanimura & Antle  
1298 Orchard Road Vegetable Transplant Nursery Project IS/MND  
Received on January 10, 2019**

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## **Additional MBARD Letter on the Tanimura & Antle 1298 Orchard Road Vegetable Transplant Nursery Project IS/MND Received on January 10, 2019**

**RE:** MBARD Comments MND Tanimura & Antle 1298 Orchard Road Vegetable Transplant Nursery Project

After the completion and submittal of the Final IS/MND to the County - RMA, a formal letter of comment was provided on January 10, 2019 from the MBARD. This is in addition to the email comment provided in the Final IS/MND for the Project. County - RMA Staff and DD&A reviewed the letter for any additional substantive comments on the Draft IS/MND that were not already addressed in the Final IS/MND. In reference to the Air Quality Modeling comment, the letter references the discussions with the County – RMA and DD&A. The CalEEMod results in the Initial Study have been revised and updated to address this item. The Final IS/MND Response C adequately addresses the comment. Please refer to Comment and Response C in the Final IS/MND.

Regarding the additional comments in the attached letter, the County - RMA is independently reviewing the recommendations and will be addressing separately in the County Staff Report on this project. The additional comments are noted below:

**Dust Control:** The MBARD acknowledges that the Draft IS/MND identifies implementation of Best Management Practices (BMP) for dust control and requests that additional MBARD mitigation measures be added as fugitive dust control measures. As noted in **Table 4.3-2 Construction & Operational Air Quality Emission**, all construction-related emissions would be below the applicable MBARD thresholds of significance for temporary construction emissions. As a result, the proposed project would not exceed the MBARD's thresholds of significance and temporary construction-related emissions would be less than significant. The Draft IS/MND notes the project would also implement standard construction BMPs related to dust suppression, which would include: 1) watering active construction areas; 2) prohibiting grading activities during periods of high wind (over 15 mph); 3) covering trucks hauling soil; and, 4) covering exposed stockpiles. The implementation of additional BMPs would further ensure that potential construction-related emissions would be minimized.

**Construction Equipment, Tree Removal, Use of Electric Pumps and Sensitive Receptors:** MBARD recommends using cleaner than required construction and tree removal equipment that conforms to ARB's Tier 4 emission standards, and whenever feasible, construction equipment use alternative fuels such as compressed natural gas (CNG), propane, electricity or biodiesel. Further, MBARD recommends use of electric pumps for future agricultural irrigation and pump installation. In reference to the proposed removal of existing trees, the MBARD advises not to burn the wood. These recommendations are noted and referred to the County - RMA.

January 10, 2019

ATTN: Richard Felsing  
San Benito County Resource Management Agency  
2301 Technology Parkway  
Hollister, CA 95023

Email: [rfelsing@cosb.us](mailto:rfelsing@cosb.us)

RE: Initial Study / MND Tanimura & Antle 1298 Orchard Road Vegetable Transplant Nursery Project

Dear Richard,

Thank you for providing the Monterey Bay Air Resources District (Air District) with the opportunity to comment on the above-referenced document.

The Air District has reviewed the document and has the following comments:

**BIO 4.4.3 ( e ) (pg. 41): Tree Removal:**

- The proposed site preparation would result in the removal of as many as 22 existing trees. The Air District advises not to burn the wood. In case the trees are disposed of via wood chipping, please make sure to contact the Air District's Engineering Division at (831) 647-9411 to discuss if a Portable Registration is necessary for the wood chipper being utilized for this project.

**Air Quality:**

- **GHG Emissions:** There are discrepancies in the report for anticipated operational GHG Emissions. Please revisit and re-run CalEEMod to make sure that the Overall Mitigated Operational GHG emissions are properly captured. Currently, the GHG Section on page 53 summarizes the GHG emissions as "less than significant" with Mitigated Emissions at 1,014 MT/CO<sub>2</sub>e/yr. The CalEEMod results on page 6 of Appendix A list the Total Mitigated CO<sub>2</sub>e at 5,555.39 MT/CO<sub>2</sub>e/yr which exceeds GHG thresholds.

Based on discussions with the County and Denise Duffy & Associates, Inc. the CalEEMod results in the Initial Study contain inaccuracies and will be thoroughly reviewed.

- **Dust Control:** The Air District appreciates the implementation Best Management Practices (BMP) for dust control. To ensure that construction contractors properly implement the fugitive dust control measures, please add these additional Air District mitigation measures to substantially reduce fugitive dust ([http://mbard.org/pdf/CEQA\\_full%20\(1\).pdf](http://mbard.org/pdf/CEQA_full%20(1).pdf), pg. 78 (8-2)):
  - Water all active construction areas at least twice daily. Frequency should be based on the type of operation, soil, and wind exposure.
  - Apply chemical soil stabilizers on inactive construction areas (disturbed lands within construction projects that are unused for at least four consecutive days).
  - Apply non-toxic binders (e.g., latex acrylic copolymer) to exposed areas after cut and fill operations and hydro see area.
  - Haul trucs shall maintain at least 2'0" of freeboard
  - Cover all trucks hauling dirt, sand, or loose materials.
  - Plant tree windbreaks on the windward perimeter of construction projects if adjacent to open land.

- Plant vegetative ground cover in disturbed areas as soon as possible.
  - Install wheel washers at the entrance to construction sites for all exiting trucks.
  - Pave all roads on construction sites.
  - Sweep streets if visible soil material is carried out from the construction site.
  - Post a publicly visible sign which specifies the telephone number and person to contact regarding dust complaints. This person shall respond to complaints and take corrective action within 48 hours. The phone number of the Air District shall be visible to ensure compliance with Rule 402 (Nuisance).
- **Sensitive Receptors:** Given the nearby proximity of sensitive receptors (nearest being ~ 250 ft from the project site), the Air District recommends using cleaner than required construction and tree removal equipment that conforms to ARB's Tier 4 emission standards, and whenever feasible, construction equipment use alternative fuels such as compressed natural gas (CNG), propane, electricity or biodiesel. This would have the added benefit of reducing diesel exhaust emissions.
  - **pg. 35 (d):** For any future agricultural irrigation pump installation, the Air District recommends the use of electric pumps, due to benefits to air quality, reducing long-term maintenance costs, and improved efficiency.
  - **Permits Required:** Air District permits or registration with the California Air Resources Board (CARB) may be required for portable construction equipment with engines 50 Hp or greater. Please contact the Air District's Engineering Division at (831) 647-9411 if you have questions about permitting.
  - **Trenching Activities:** If old underground piping or other asbestos containing construction materials are encountered during trenching activities, *Rule 424* could apply. <https://www.arb.ca.gov/drdb/mbu/cur.htm>. Please contact Shawn Boyle in the Compliance Division at (831) 647-9411.

I appreciate the opportunity to comment on the Initial Study / MND for the Tanimura & Antle 1298 Orchard Road project. Please let me know if you have any questions. I can be reached at (831) 718-8021 or [hmuegge@mbard.org](mailto:hmuegge@mbard.org).

Best Regards,



Hanna Muegge  
Air Quality Planner

cc: David Frisbey, Planning & Air Monitoring Manager  
Richard A. Stedman, Air Pollution Control Officer  
Shawn Boyle, Air Quality Compliance Inspector

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