



South Coast
Air Quality Management District

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**Draft Environmental Impact Report (Draft EIR) for the Proposed General Plan
Amendment No. 887, Change of Zone No. 7589, Tentative Tract No. 35751**

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 Environmental Impact Report.

Pursuant to Public Resources Code Section 21092.5, please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final Environmental Impact Report. 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,

Susan Nakamura
Planning & Rules Manager
Planning, Rule Development & Area Sources

Attachment

SN:GM

RVC090318-03
Control Number

Construction Air Quality Analysis

1. On page 4.3-29 of the Draft EIR and in the URBEMIS2007 computer model output sheets in Appendix C Part I, the lead agency has limited soil disturbance to 5-acres per day. The five-acre per day figure was also used in estimating project air quality impacts for localized significance thresholds (LST). In addition, the lead agency has switched on “watering three times per day” as a mitigation measure during construction operations when modeling potential soil disturbance impacts during the grading phases of the project. In the Final EIR, the lead agency should include the 5-acre per day of soil disturbance limit and watering three times daily as formal mitigation measures along with the mitigation measures included on page 4.3-40 of the Draft EIR since both measures were used in estimating construction impacts including LST impacts in the Draft EIR. Finally, Table 1.0-A, EIR Summary Matrix/Mitigation Monitoring Program on page 1.0-18 of the Draft EIR should be revised in the Final EIR to include these two measures.

Construction Mitigation Measures

2. On page 4.3-40, the lead agency lists fugitive dust mitigation measures citing compliance with AQMD Rule 403 - Fugitive Dust. It should be noted that complying with a rule, regulation, law, etc., should not be considered as mitigation if it is required. Instead, the effects of complying with a rule, e.g., Rule 403 should be part of the project description and incorporated into the project-specific impact calculations, i.e., the lead agency should include the specific mitigation measures from Rule 403 the lead agency will formally adopt, and include those measures in the Final EIR with the other specific measures listed starting on page 4.3-40 in the Draft EIR.
3. Because the lead agency has determined that the proposed project’s short-term air quality impacts are estimated to exceed established daily significance thresholds for particulate matter PM10 and PM2.5 (fugitive dust), the SCAQMD recommends that the lead agency consider adding additional mitigation measures to those listed starting on page 4.3-40 of the Draft EIR to further reduce construction air quality impacts from the project, if applicable and feasible. Mitigation measure suggestions can also be found at http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html:

Recommended additions:

Mitigation Measures for PM10 and PM2.5 (Fugitive Dist):

- Install wheel washers where vehicles enter and exit the construction site onto paved roads or wash off trucks and any equipment leaving the site each trip;
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation;

- Apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more);
- Apply water three times daily, or non-toxic soil stabilizers according to manufacturers' specifications, to all unpaved parking or staging areas or unpaved road surfaces;
- Pave road and road shoulders;
- Traffic speeds on all unpaved roads to be reduced to 15 mph or less; and
- Sweep streets at the end of the day if visible soil is carried onto adjacent public paved roads (recommend water sweepers with reclaimed water).

Mitigation Measures for NO_x:

- Use electricity from power poles rather than temporary diesel or gasoline power generators;
- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site. Require construction equipment that meet or exceed Tier 2 standards and equip construction equipment with oxidation catalysts, particulate traps and demonstrate that these verified/certified technologies are available; and
- Schedule construction activities that affect traffic flow on the arterial system to off-peak hour to the extent practicable.