



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178

(909) 396-2000 • www.aqmd.gov

E-mailed: July 3, 2014
MSTRAITE@rctlma.org

July 3, 2014

Mr. Matt Straite
Project Planner
4080 Lemon Street, 12th Floor
P.O. Box 1409
Riverside, CA 92502-1409

Review of the Draft Environmental Impact Report (Draft EIR) for Colinas del Oro Specific Plan No. 364 Project

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comment is intended to provide guidance to the Lead Agency and should be incorporated into the final environmental impact report (Final EIR) as appropriate.

Based on pages 5-50 and 5-52 of the Draft EIR it appears that the proposed project will require drilling, blasting, loading and hauling for rock removal activities during construction. However, it is unclear whether the Lead Agency has evaluated the potential localized air quality impacts from these rock removal activities during the construction phase of the project. Specifically, the Lead Agency stated that, "given the short emissions duration and expected distance separation between blasting activities and off-site sensitive uses, LST thresholds will not be exceeded." Further, the Lead Agency references dispersion modeling that was completed in a previous CEQA document to substantiate this conclusion; however, the Lead Agency did not include a technical report to support this finding. As a result, the Lead Agency has not demonstrated that the project will result in less than significant air quality impacts during construction. Therefore, the SCAQMD staff recommends that the Lead Agency include an assessment of potential localized air quality impacts from rock removal activities during construction of the proposed project. These potential impacts should be assessed using SCAQMD's Localized Significance Methodology and compared to the appropriate significance thresholds¹.

In the event that the Lead Agency determines the proposed project will result in significant construction-related air quality impacts the SCAQMD staff recommends that the Lead Agency require mitigation to minimize these impacts to a less than significant

¹ The Localized Construction Significance Thresholds and Methodologies are available at :
<http://www.aqmd.gov/ceqa/hdbk.html>

level. Additional construction-related air quality mitigation measures are available at:
http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html

Pursuant to Public Resources Code Section 21092.5, SCAQMD staff requests that the Lead Agency provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. Further, staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,



Ed Eckerle
Program Supervisor
Planning, Rule Development & Area Sources

EE:DG

RVC140322-03

Control Number