



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

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Mr. John Freiman, Planner
City of San Jacinto
Community Development Department
248 E. Main Street
San Jacinto, CA 92583

**Draft Mitigated Negative Declaration (MND) for the Proposed Esplanade Specific
Plan**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The SCAQMD also appreciates the additional time to allowed to review the Draft MND for the proposed project and provide comments. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final Negative Declaration (MND).

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final Negative Declaration. 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,

Steve Smith, Ph.D.
Program Supervisor, CEQA Section
Planning, Rule Development & Area Sources

Attachment

SS:GM

RVC050322-06
Control Number

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1. Construction Emissions

Table 3-2 on page 3-13 shows that during grading NO_x, CO, and PM₁₀ (mitigated) exceed the SCAQMD's recommended significance thresholds by a wide margin. Further, Table 3-2 shows that ROG emissions during finish construction also substantially exceed the SCAQMD's ROG significance threshold.

According to paragraph two on page 3-13 even with enhanced dust control measures PM₁₀ emissions of 393 pounds per day would still exceed the SCAQMD's recommended PM₁₀ significance threshold of 150 pounds per day. It is not clear what comprises these enhanced measures but it is assumed these are the fugitive dust mitigation measures on page 3-14 and 3-15. No effort is made to provide control efficiencies for the fugitive dust mitigation measures or reconcile unmitigated dust emissions with the fugitive dust estimates in the URBEMIS 2002 print out in Appendix B. Similarly, no effort was made to provide control efficiencies for the construction-related mitigation measures. Although the lead agency faxed URBEMIS 2002 output sheets to SCAQMD staff upon request showing mitigated totals and control efficiencies of mitigation measures activated by the lead agency in the URBEMIS 2002 program, those mitigated output sheets were not included in the Draft MND. Therefore, the Draft MND did not include the URBEMIS 2002 model's mitigated results. The lead agency should for this project and all future projects, provide all supporting documentation related to air quality to the SCAQMD with the Draft CEQA document.

Further, the lead agency does not make a strong commitment to implement construction-related mitigation measures by including phrases such as "where feasible," "to the extent possible," "if necessary," "where practical," etc. Unless mitigation measures are required, the lead agency should not take credit for the mitigation measures listed on pages 3-14 and 3-15.

Consequently, based upon the above comments, the lead agency has not demonstrated that construction air quality impacts are not significant. Further, given the magnitude that construction emissions exceed the recommended construction significance thresholds, it is likely that the proposed project does not qualify for the mitigated negative declaration relative to construction emissions.

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2. Operational Emissions

Table 3-3 on page 3-16 shows that long-term operational emissions exceed the SCAQMD significance thresholds for PM10 and by wide margins for ROG, NO_x, and CO. Similar to the comments on construction emissions, the lead agency has provided upon request by SCAQMD staff the URBEMIS 2002 modeling output sheets but did not provide any control efficiencies or the quantification of the mitigation measures effects listed at the bottom of page 3-16 in the Draft MND. Given the magnitude by which the operational impacts exceed the recommended operational significance thresholds, it is unlikely that operational impacts from ROG, NO_x, CO, and PM10 can be reduced to less than significance levels. As a result, the proposed project does not qualify as a mitigated negative declaration.

3. CO Analysis

In Table 3-4 (Carbon Monoxide Concentrations {AM/PM}) on page 3-18, the lead agency has estimated CO concentrations during peak commute hours and compared those estimates to the 1-hour CO standard of 20 parts per million (ppm) in Table 3-4 but did not include a comparison to the state 8-hour CO concentration standard of 9 ppm.

In the South Coast Air Quality CEQA Air Quality Handbook (Handbook) in Chapter 9 on page 9-10, the criteria to determine if a "CO hot spot" has been created includes project analysis that compares the estimated project CO concentrations with both state 1-hour and 8-hour CO standards. Since the lead agency has not included comparison of the project CO concentrations in Table 3-4 to the 8-hour standard, the lead agency should include that comparison in the Final MND to demonstrate that localized CO impacts are less than significant. The supporting documentation for the CO hot spot analysis should also be included in the Final MND.

In addition, it is recommended that the lead agency modify Table 3-4 to include the actual Level of Service (LOS) values and add the volume to capacity ratios (V/C) to Table 3-4 since both LOS and V/C ratios are used to determine whether a CO hot spots analysis is warranted. Adding this information helps to document the lead agency's finding of less than significant impact for localized CO concentrations.

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4. The documentation for the CO analysis was also not included in the Draft MND. SCAQMD staff requested the supporting documentation to review the CO hot spot analysis but this information was not provided by the lead agency. The SCAQMD is therefore unable to verify the lead agency's finding of less than significant impact for local CO impacts. Although not included in the Draft MND, the CO hot spot analysis documentation should be included in the Final MND.
5. Should the lead agency, after final review (see comment #2), determine that the short-term (construction) air quality impacts from the proposed project are estimated to exceed established daily significance thresholds for Reactive Organic Gases (ROG), Nitrogen Oxide (NO_x), and Particulate Matter (PM10), the SCAQMD recommends that the lead agency consider modifying the following mitigation measures and adding additional mitigation measures to further reduce construction air quality impacts from the project, if applicable and feasible:

The following change is recommended for Mitigation Measure 3.3.A to reduce fugitive dust:

1. Under windy conditions where velocities are forecast to exceed 25 miles per hour as instantaneous gusts (as ascertained by phone calls to the SCAQMD), all ground disturbing activities shall be halted until winds are forecast to be less than 25 miles per hour. The contractor may install on-site wind monitoring equipment at the construction office and base the halt of grading activities on actual measured wind gusts, instead of SCAQMD forecasts.
2. Portions of the construction site that remain inactive ~~longer than three months~~ for ten days or more shall be seeded and watered or have non-toxic stabilizers applied according to manufacturers' specifications until grass cover is grown or otherwise stabilized in a manner acceptable to the City.
3. All materials transported off-site shall be ~~either sufficiently watered or~~ securely covered to prevent excessive amounts of dust.

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1. Where vehicles leave the construction site and enter adjacent public streets, the streets shall be swept daily (recommend SCAQMD Rule 1186 approved water sweepers with reclaimed water) or washed down at the end of the work day to remove soils tracked onto the paved surface. Any visible track-out extending more than fifty feet from the access point shall be swept or vacuumed within 30-minutes of disposition.

The following is a list of additional recommended mitigation measures to further reduce fugitive dust:

- 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.

The following change is recommended for Mitigation Measure 3.3.B to reduce construction-related vehicle and equipment exhaust emissions:

- All ~~diesel-powered~~ vehicles and equipment shall be properly operated and maintained according to manufacturers' specifications.

The following is a list of additional recommended mitigation measures to further reduce construction-related vehicle and equipment exhaust emissions:

- Configure construction parking to minimize traffic interference.
- Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow.
- Schedule construction activities that affect traffic flow on the arterial system to off-peak hour to the extent practicable.
- Reroute construction trucks away from congested streets or sensitive receptor areas.
- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site.
- Use electricity from power poles rather than temporary diesel generators.

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6. On page 3-15 in Volume I of the Draft MND, the lead agency proposes mitigation measures MM 3.3.B, which includes the use of diesel particulate filters to reduce NOx emissions from construction vehicles and equipment. As shown in the URBEMIS 2002 construction emission estimates output sheets sent to the SCAQMD by the lead agency, the lead agency has activated this measure.

It is recommended that the lead agency investigate the availability of diesel particulate filters. Currently, the availability of this technology is relatively limited, so it might not be available for use by the project proponent to completely mitigate construction air quality impacts. Based on the possibility that a technology to mitigate mobile source emissions may not be available, a more conservative approach would be to turn off that mitigation measure and not take credit for control efficiency associated with it. It is further recommended that the lead agency document the availability of construction equipment fitted with this control technology or identify additional mitigations to ensure that construction air quality impacts are not significant.