



South Coast
Air Quality Management District

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FAXED: NOVEMBER 9, 2007

November 9, 2007

County of Riverside
Ms. Shelley Esteybar, Planner
Planning Department
P.O. Box 1409
Riverside, CA 92502-1409

**Draft Mitigated Negative Declaration (Draft MND) for the proposed Tentative
Tract Map No. 32332 Amended No. 2 – EA40189**

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 Mitigated Negative Declaration.

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final Mitigated 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

RVC071026-04
Control Number

Construction and Operation Emissions

1. In the Initial Study (IS)/Draft Mitigated Negative Declaration's (Draft MND) project description, the lead agency proposes to subdivide 23.70 acres and build 34-single family residences but does not quantify the project's construction or operation air quality impacts. Because this information has not been included in the Draft MND, the lead agency has therefore not demonstrated that the proposed project will not generate significant adverse construction or operational air quality impacts that may trigger further analysis pursuant to the California Environmental Quality Act.

To calculate the proposed project's emission impacts, the lead agency can utilize the current URBEMIS 2007 land use emissions model, which can be accessed at <http://www.aqmd.gov/ceqa/models.html> or follow the calculation methodologies in Chapter 9 and the Appendix to Chapter 9 in the South Coast AQMD's CEQA Air Quality Handbook. Should the lead agency conclude after its analyses that construction or operational air quality impacts exceed the SCAQMD daily significance thresholds, staff has compiled mitigation measures (see comment #4) to be implemented if the air quality impacts are determined to be significant.

Mitigation measure suggestions can be found at

http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html

PM2.5 Significance Thresholds

2. In response to adoption of PM2.5 ambient air quality standards by U.S. EPA and CARB, SCAQMD staff has developed a methodology for calculating PM2.5 emissions when preparing air quality analyses for California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) documents. To determine if PM2.5 air quality impacts are significant, SCAQMD staff has also developed recommended regional and localized significance thresholds. When preparing the air quality analysis for the proposed project, it is recommended that the lead agency perform a PM2.5 significance analysis by following the guidance found at http://www.aqmd.gov/ceqa/handbook/PM2_5/PM2_5.html. Further, SCAQMD staff has compiled mitigation measures to be implemented if the PM2.5 impacts or other pollutant air quality impacts are determined to be significant. Mitigation measure suggestions can be found at

http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html

Localized Significance Thresholds

3. As noted on page 3 of the Initial Study/Draft MND, the proposed project is located within one-quarter mile of sensitive receptors. Therefore, the SCAQMD requests that the lead agency evaluate localized air quality impacts to ensure that any nearby sensitive receptors are not adversely affected by the construction activities that are occurring in close proximity. SCAQMD guidance for performing a localized air quality analysis can be found at the following web address:

<http://www.aqmd.gov/ceqa/handbook/LST/LST.html> .

Mitigation Measures - Construction

4. Should the lead agency, after final review (see comment numbers 1,2 and 3), determine that the short-term (construction) air quality impacts from the proposed project are estimated to exceed established SCAQMD daily significance thresholds, the SCAQMD recommends that the lead agency consider adding the following mitigation measures to reduce construction air quality impacts from the project to below established daily significance thresholds, if applicable and feasible:

PM10 – Recommended Additions:

- 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).
- Replace ground cover in disturbed areas as quickly as possible;
- Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 mph;
- All trucks hauling dirt, sand, soil, or other loose materials are to be covered.

NO_x – Recommended Additions:

- Prohibit all diesel trucks from idling in excess of five minutes, both on- and off-site;
- All vehicles and equipment will be properly tuned and maintained according to manufacturers' specifications;
- Use electricity from power poles rather than temporary diesel or gasoline power generators;
- 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;
- All streets shall be swept at least once a day using SCAQMD Rule 1186 and 1186.1 certified street sweepers or roadway washing trucks if visible soil materials are carried to adjacent streets (recommend water sweepers with reclaimed water);

- Require construction equipment that meet or exceed Tier 2 standards; use emulsified diesel fuels; and equip construction equipment with oxidation catalysts, particulate traps, or other verified/certified retrofit technologies, etc.
- Use alternative clean fueled off-road equipment or give extra points in the bidding process for contractors committing to use such equipment;
- Configure construction parking to minimize traffic interference.