



South Coast
Air Quality Management District

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FAXED: SEPTEMBER 20, 2007

September 20, 2007

Mr. Corrie Kates
City of Indian Wells
Community Development Department
44-950 El Dorado Drive
Indian Wells, CA 92210-7497

Dear Mr. Kates:

**Draft Supplemental Environmental Impact Report (DSEIR) for the
Indian Wells Garden of Champions Tournament Center:
(August 2007)**

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 in the Final Supplemental Environmental Impact Report.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Supplemental Environmental Impact Report. The SCAQMD would be available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Charles Blankson, Ph.D., Air Quality Specialist – CEQA Section, at (909) 396-3304 if you have any questions regarding these comments.

Sincerely

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

Attachment

SS:CB

RVC070829-05

Control Number

**Draft Supplemental Environmental Impact Report (DSEIR) for the
Indian Wells Garden of Champions Tournament Center**

1. Proposed Project's PM10 Emissions:

The lead agency has incorrectly labeled the significance designation for the proposed project's PM10 emissions in Table 6 on page 3.3-9 of the DSEIR which shows 202.76 pounds per day of PM10 emissions as not significant. Table 9 on page 3.3-14 shows 2.33 pounds per day of PM10 emissions for 2009 Construction Activity as significant. Finally, Table 10 on page 3.3-15 indicates that 196.94 pounds of PM10 emissions per day are noted are not significant. These incorrect conclusions should be corrected in the Final SEIR

2. Localized Impacts:

Consistent with the SCAQMD's environmental justice program and policies, the SCAQMD recommends that the lead agency also evaluate localized air quality impacts of the proposed project. SCAQMD staff recommends that for this project and for future projects, the lead agency undertake the localized analysis to ensure that all necessary and feasible mitigation measures are implemented to protect the health of existing or potential sensitive receptors close to the proposed project. This necessary to assess the proposed project's localized impacts on the residential development to the northeast of the proposed project across from Washington Street. The methodology for conducting the localized significance thresholds analysis can be found on the SCAQMD website at: www.aqmd.gov/ceqa/handbook/LST/LST.html.

3. Mitigating Proposed Project's Emissions:

Given that the proposed project's volatile organic compounds (VOC) and nitrogen oxides (NO_x) emissions are significant for both construction and operation and carbon monoxide (CO) and PM10 are significant for operation,, SCAQMD staff recommends that the lead agency consider the following construction mitigation measures for implementation in addition to the measures listed in Section 8.0 of the DSEIR:

- Require trucks and other vehicles that would be transporting materials and other supplies to the project site, to use alternative clean fuel such as compressed natural gas.
- For construction equipment require the use of oxidation catalysts and alternative clean fuel such as natural gas instead of gasoline- or diesel-powered engines. However, where diesel equipment has to be used because there are no

practical alternatives, the construction contractor should use particulate filters as well as oxidation catalysts.

- To reduce volatile organic compounds (VOC) emissions, restrict the number of gallons of architectural coatings used per day. Where feasible, paint contractors should use hand applications instead of spray guns. The lead agency should also encourage water-based coatings or coatings with a lower VOC content than 100 grams per liter. Alternatively, consider using materials that do not need to be painted or are painted prior to transporting to the site.

For lists of additional mitigation measures for consideration by the lead agency to reduce both construction and operation air quality impacts please refer to SCAQMD website http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html for vehicles and equipment that have been certified by CARB and their availability.

On page 3.3-13 mitigation measure AQ-1 requires reducing the maximum acreage graded on any one day to 20 acres. This mitigation measure is inconsistent with the statement in subsection 2.3.5 on page 2-13, which states that approximately 10 acres are anticipated to be graded per day. The SCAQMD recommends modifying mitigation measure AQ-1 to be consistent with the statement in subsection 2.3.5 on page 2-13.