



South Coast
Air Quality Management District

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FAXED: January 12, 2010

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City of Menifee
Planning Department
29714 Huan Road
Menifee, CA 92586

**Review of the Draft Mitigated Negative Declaration (Draft MND)
for the Proposed Heritage Square Project**

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 (final MND) as appropriate.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the final MND. 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,

A handwritten signature in black ink that reads "Susan Nakamura".

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

Attachment

EE:DG

RVC091216-03
Control Number

Air Quality Analysis and Mitigation Measures:

1. In Table 3 (Daily Construction Summer Emissions) on page 12 of the Draft MND the lead agency summarizes the project's regional construction air quality impacts. The lead agency's evaluation of the project's regional air quality impacts during project construction assumes that only four acres of the project site will be disturbed per day. Therefore, the SCAQMD staff recommends that the lead agency provide mitigation measures that are consistent with the project's regional construction emissions analysis.
2. Section Two (Applicable General Plan and Zoning Regulations) of the Draft MND indicates that the project site is located within one-quarter mile of sensitive receptors (i.e. residential and school properties). Thus, the SCAQMD requests that the lead agency revise the air quality analysis to evaluate localized air quality impacts to ensure that 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>. In the event that the lead agency's revised regional construction air quality analysis requested in this comment demonstrates that any criteria pollutant emissions exceed the SCAQMD's daily significance thresholds, the SCAQMD recommends that the lead agency consider adding the following mitigation measures to further reduce air quality impacts from the construction phase of the project, if feasible:

NOx:

- Prohibit vehicle and engine idling in excess of five minutes and ensure that all off-road equipment is compliant with the California Air Resources Board's (CARB) in-use off-road diesel vehicle regulation and SCAQMD Rule 2449,
- Require construction equipment to meet or exceed Tier 3 standards with available CARB verified or certified technologies,
- Require the 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,
- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site,
- Schedule construction activities that affect traffic flow on the arterial system to off-peak hours to the extent practicable,
- Reroute construction trucks away from congested streets or sensitive receptor areas, and
- Improve traffic flow by signal synchronization, and ensure that all vehicles and equipment will be properly tuned and maintained according to manufacturers' specifications.

For additional measures to reduce off-road construction equipment, refer to the mitigation measure tables located at the following website:

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

Fugitive Dust:

- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation,
- When sweeping streets to remove visible soil materials use SCAQMD Rule 1186 and 1186.1 certified street sweepers or roadway washing trucks, and
- Replace ground cover in disturbed areas as quickly as possible.

VOC:

- Use coatings and solvents with a VOC content lower than that required under SCAQMD Rule 1113,
 - Construct or build with materials that do not require painting, and
 - Require the use of pre-painted construction materials.
3. The SCAQMD staff recommends that the lead agency consider adding the following mitigation measures to further reduce air quality impacts from the operation phase of the project, if feasible:
- Design the project such that entrances and exits minimize trucks traversing past neighbors or other sensitive receptors,
 - Design the project such that any check-in point for trucks is well inside the facility property to ensure that there are no trucks queuing outside of the facility,
 - Develop, adopt and enforce truck routes both in an out of city and in and out of facilities,
 - Have truck routes clearly marked with trailblazer signs to minimize truck traffic in residential areas,
 - Re-route truck traffic by restricting truck traffic on certain sensitive routes;
 - Improve traffic flow by signal synchronization,
 - Require or provide incentives for particulate traps that meet CARB certified level 3 requirements,
 - Electrify service equipment at facility, and
 - Conduct air quality monitoring at sensitive receptors.