



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

March 13, 2019

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Draft Environmental Impact Report (DEIR) for the Proposed River Street Marketplace Project (SCH No. 2018011019)

South Coast Air Quality Management District (SCAQMD) staff 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 EIR.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to demolish an existing single-story office building and construct five mixed-use buildings totaling 64,900 square feet on 5.86 acres (Proposed Project). The Proposed Project is located on the southeast corner of Paseo Adelanto and River Street. Construction of the Proposed Project is expected to occur over 17 months and become operational in 2020¹.

SCAQMD Staff's Summary of Air Quality Analysis

In the Air Quality Section, the Lead Agency quantified the Proposed Project's construction and operational emissions and compared those emissions to SCAQMD's recommended regional and localized air quality CEQA significance thresholds. Based on the analysis, the Lead Agency found that the Proposed Project's construction emissions would not exceed SCAQMD's regional or localized air quality CEQA significance thresholds, after the implementation of mitigation measures (MM) AQ-1, MM AQ-2, MM AQ-3, and SCAQMD Rule 403 [137 pounds per day (lbs/day) of NO_x emissions when unmitigated and 87 lbs/day of NO_x emissions when mitigated]². MM AQ-1 restricts the number of haul trucks permitted at the Proposed Project during rough grading and soil hauling activities to be no more than 125 haul trucks per days (no more than 5,000 miles per day)³. MM AQ-2 requires the use of architectural coatings containing less than 50 grams per liter (g/l) of volatile organic compounds (VOCs)⁴. MM AQ-3 restricts the number of haul trucks permitted at the Proposed Project during asphalt demolition and asphalt hauling activities to 14 haul trucks per day (no more than 283 tons per day)⁵. Additionally, the Lead agency found that operation of the Proposed Project would not result in emissions that exceed SCAQMD's regional or localized air quality CEQA significance thresholds.

SCAQMD Staff's Comments – Additional Recommended Mitigation Measures

CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse air quality impacts. To further reduce the Proposed Project's construction and operational emissions, and in addition to MM AQ-1 through MM AQ-3, SCAQMD staff recommends that the Lead Agency review and incorporate the following mitigation

¹ DEIR. Section 5.2, Environmental Analysis: *Air Quality*. Page 5.2-27.

² *Ibid.* Table 5.2-9, *Maximum Daily Regional Construction Emissions*, Page 5.2-29.

³ *Ibid.* Page 5.2-36.

⁴ *Ibid.*

⁵ *Ibid.* Page 5.2-37.

measures in the Final EIR. For more information on potential mitigation measures as guidance to the Lead Agency, please visit SCAQMD's CEQA Air Quality Handbook website⁶.

Construction – Soil and Asphalt Hauling

- 1) Require the use of zero-emission or near-zero emission heavy-duty haul trucks during construction, such as trucks with natural gas engines that meet CARB's adopted optional NOx emissions standard of 0.02 grams per brake horsepower-hour (g/bhp-hr). At a minimum, require that operators of heavy-duty haul trucks visiting the Proposed Project during construction commit to using 2010 model year or newer engines that meet CARB's 2010 engine emission standards of 0.01 g/bhp-hr for particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks.
- 2) Prior to the issuance of a grading permit, the project applicant shall establish haul truck routes in and out of the Proposed Project site, avoiding residential or other sensitive receptors uses.
- 3) Have haul truck routes clearly marked with trailblazer signs so that trucks will not enter residential areas.

Operation – Area Sources

- 4) Provide electric vehicle (EV) charging stations, or at a minimum, require the Proposed Project to be constructed with the appropriate infrastructure to facilitate sufficient electric charging for trucks and other vehicles to plug-in. Electrical hookups should be provided at the onsite truck stop for truckers to plug in any onboard auxiliary equipment, and in the parking lot for passenger vehicle use. Electrical panels should be appropriately sized to allow for future expanded use.
- 5) Provide incentives for employees working at the Proposed Project in order to encourage the use of public transportation or carpooling, such as discounted transit passes or carpool rebates.
- 6) Implement a rideshare program for employees working at the Proposed Project and set a goal to achieve a certain participation rate over a period of time.
- 7) Maximize the use of solar energy including solar panels. Installing the maximum possible number of solar energy arrays on the building roofs and/or on the Proposed Project site to generate solar energy for the facility.
- 8) Require the use of electric landscaping equipment, such as lawn mowers and leaf blowers.
- 9) Require the use of electric or alternatively fueled sweepers with HEPA filters.
- 10) Maximize the planting of trees in landscaping areas and parking lots.
- 11) Use light colored paving and roofing materials.
- 12) Utilize only Energy Star heating, cooling, and lighting devices, and appliances.

⁶ South Coast Air Quality Management District. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.

Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), SCAQMD staff requests that the Lead Agency provide SCAQMD staff with written responses to all comments contained herein prior to the certification of the Final PEIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and to the public who are interested in the Proposed Project. Further, when the Lead Agency makes the finding that the recommended mitigation measures are not feasible, the Lead Agency should describe the specific reasons for rejecting them in the Final EIR (CEQA Guidelines Section 15091).

SCAQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Robert Dalbeck, Assistant Air Quality Specialist, at RDalbeck@aqmd.gov or (909) 396-2139, should you have any questions.

Sincerely,

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Planning, Rule Development & Area Sources

LS:RD

ORC190201-08

Control Number