



South Coast Air Quality Management District

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Mr. Steve Walker, Principal Planner
City of Indio
Community Development Department
100 Civic Center Mall
Indio, CA 92201

Draft Environmental Impact Report for the Proposed Indio Jackson Retail Center

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 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 adoption of the Final Environmental Impact Report. The SCAQMD 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

RVC060928-01
Control Number

Air Quality Analysis

1. Because the proposed site is located less than a quarter-mile from an existing single-family residences located east of the proposed site, a localized air quality analysis may be warranted to ensure that the residents in the existing single-family site 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> .
2. Although the lead agency performed a microscale CO screening analysis and included those estimates in Appendix B - Air Quality Analysis on page 19, the lead agency did not include a discussion or a summary of its findings in the Air Quality Section of the Draft EIR. In order to disclose those potential impacts to the public, the lead agency, at minimum, should provide a summary of the results in the Section 4.1 Air Quality in the Final EIR.

Health Risk Assessment

3. In Section 4.5.1 Transportation and Circulation, the lead agency indicates that the proposed project will increase vehicle trips on adjacent streets estimating that the proposed project will generate a total of 17,513 trips per day. The trip generation estimates, however, do not quantify potential truck trips or truck vehicle miles traveled (VMT). Further, there is no indication of whether or not the increased number of vehicle trips will include trips by heavy-duty diesel trucks transporting materials to and from the proposed retail commercial development or the home improvement store. This information should be included in the Final EIR, and the VMT assumptions made in the traffic analysis should also be consistent with the VMT used in the air quality analysis. The identification of the heavy-duty truck trips information is important because the California Air Resources Board has classified the particulate portion of diesel exhaust emissions as carcinogenic. If there is a substantial increase in the number of heavy-duty diesel truck trips, an air toxics health risk analysis may be warranted. This is particularly relevant since the proposed project is next to existing single-family residential homes east of the proposed site.

The SCAQMD has developed a methodology for estimating cancer risks from mobile sources in a document entitled Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions. This document can be downloaded from the AQMD's CEQA web pages at the following URL:

http://www.aqmd.gov/ceqa/handbook/mobile_toxic/diesel_analysis.doc . The HRA Guidance document also contains a list of mitigation measures that can be used to mitigate diesel exhaust emissions. The SCAQMD recommends that the lead agency consider the following mitigation measures from the HRA Guidance document for incorporation into the proposed project and the Final MND, if applicable and feasible:

Potential Mitigation Measures for Long Term Operations

- Provide a minimum buffer zone of 300 meters between truck traffic and sensitive receptors
- Improve traffic flow by signal synchronization;
- Enforce any local truck parking restrictions;
- Develop park and ride programs;
- Restrict truck idling to five minutes or less;
- Restrict operation to “clean” trucks;
- Electrify service equipment at facility;
- Provide electrical hook-ups for trucks that need to cool their load;
- Electrify auxiliary power units;
- Pave roads and road shoulders.
- Require or provide incentives for haul/delivery trucks to be retrofitted with particulate traps.
- Conduct air quality monitoring at sensitive receptors if impacts are found to be significant.

Mitigation Measures for Construction Emissions

4. In the Draft EIR on ES-4 and in the Air Quality Impact Analysis (AQIA) under Mitigation on page 21, the SCAQMD recommends modifying the following portion of page ES-4 and page 21 in order to include the specific mitigation measures that the lead agency has adopted and is committed to implementing to reduce construction air quality impacts: “Measures that ~~may~~will be integrated into the DCP ~~might~~ include...”
5. On page 4.1-11 of the Draft EIR, the lead agency states that the use of ARB-certified Tier 3 engines would be required for construction vehicles and equipment to reduce short-term NO_x emissions below the daily significance level. Currently, the availability of Tier 3 engines is relatively limited, so they may not be available for use by the project proponent. Until the lead agency can demonstrate the availability of the Tier 3 engines, the lead agency should turn off this mitigation measure and not take credit for control efficiencies associated with them.
6. Because construction air quality impacts remain significant for NO_x after mitigation (see comment #5), the SCAQMD recommends the lead agency consider implementing the following mitigation measures in addition to the measures listed in pages 4.1-14 and 4.1-15 for construction to reduce applicable construction-related NO_x emissions associated with the proposed project, if applicable and feasible:
 - Prohibit truck idling in excess of five minutes.
 - 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.

- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site.
7. In addition to the measures proposed on page 4.1-14 and 4.1-15 of the Draft EIR, , the SCAQMD recommends that the lead agency consider modifying the following measure 4.1-2 and adding the following mitigation measures, if applicable and feasible, in order to further educe project-construction air quality impacts from PM10 (fugitive dust):

Mitigation Measure 4.1-2

- Soil disturbance shall be terminated when high winds (as instantaneous gusts) (exceed >25 mph) ~~make dust control extremely difficult.~~

Recommended Additions:

- All trucks hauling dirt, sand, soil, or other loose materials are to be covered;
- Water active sites at least twice daily;
- Apply water three times daily, or non-toxic soil stabilizers according to manufacturers' specifications, to all unpaved parking or staging areas or unpaved road surfaces;
- Pave road and road shoulders;
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation.