



South Coast  
Air Quality Management District

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Ms. Windy Worthey, Principal Environmental Planner  
Planning Department  
130 South Main Street  
Lake Elsinore, CA 92530

**Draft Mitigated Negative Declaration (Draft MND) for the Proposed Greenwald  
Avenue Commercial 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 Draft Mitigated Negative Declaration.

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final 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  
Program Supervisor – CEQA Section  
Planning, Rule Development & Area Sources

Attachment

SS:GM

RVC080805-06  
Control Number

### **Construction Air Quality Analysis**

1. In the attached Air Quality Analysis, Tables 4-4, 6-1, and 6-3 include a footnote stating that grading fugitive dust emissions were calculated using SCAQMD's sample LST construction calculations. Since the LST sample spreadsheets were not included in Appendix B, staff is unable to confirm this footnote or determine which project size sample LST calculations were used. Assuming the five acre sample calculations were used, the SCAQMD's sample emissions results are based on the following pieces of equipment: one rubber-tired dozer; two graders; and three tractors/loaders/backhoes. Page 26 of the attached Air Quality Analysis shows eight pieces of construction equipment. If the lead agency is relying on the equipment mix in the SCAQMD sample LST construction spreadsheets to calculate fugitive dust emissions, then a mitigation measure must be included to limit the construction equipment used onsite to the same equipment mix and hours of operation used in the sample construction scenario.
2. In Table 3 on page 29 of the Draft MND, peak daily NO<sub>x</sub> grading construction emissions are estimated to be 150.11 pounds per day, which exceeds the SCAQMD's recommended NO<sub>x</sub> construction significance threshold of 100 pounds per day. No mitigation measures are shown in the text of the Draft MND to reduce NO<sub>x</sub> grading emissions to less than significant. In the attached Air Quality Analysis on pages five and six and again on pages 53 and 54, the consultant identifies three scenarios that correlate to mitigation measures that appear to reduce NO<sub>x</sub> grading emissions to less than significance. These measures include the following.
  - 1) On-road haul trucks will meet or exceed year 2002 emission standards. SCAQMD staff requests that this requirement be changed to year 2007 emission standards. (Note: Tiers refer to off-road engine standards.
  - 2) Limit the distance that export materials will be moved from the proposed project site.
  - 3) The four scrapers and two dozers would be required to meet or exceed Tier II standards. (Note: the last bullet point on page five appears to contain a typo, the Tier should be II not I.)

First, the lead agency should specifically identify the measures used to mitigate the NO<sub>x</sub> grading emissions to less than significant in the text of the Final MND. Second, the emission reductions from the mitigation measures specified should be quantified to demonstrate that NO<sub>x</sub> grading emissions are less than significant. Finally, the lead agency should describe any backup NO<sub>x</sub> reduction measures in the event that year 2007 on-road trucks and/or Tier II off road equipment are not available.

### **Construction On- and Off-Road Mitigation Measures**

3. In the event that low NO<sub>x</sub> haul trucks and off road equipment are not available, (see comment #2), the SCAQMD recommends that the lead agency consider adding the

following mitigation measures to further reduce NO<sub>x</sub> impacts from the project, if applicable and feasible:

NO<sub>x</sub>

Recommended Additions:

- Prohibit truck idling in excess of five minutes;
- Alternative fueled off-road equipment;
- 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;
- 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;
- Improve traffic flow by signal synchronization; and
- All vehicles and equipment will be properly tuned and maintained according to manufacturers' specifications.

**Gasoline Dispensing Equipment**

4. In the project description, the lead agency includes a proposed 3,000 foot convenience store on Parcel 1 that would also include a gas station that would have gasoline storage tanks and dispensing equipment. In the Final MND, the lead agency should include SCAQMD Rule 461 - - Gasoline Transfer and Dispensing in the list of applicable regulatory requirements for the project starting after page 9 of the Draft MND. Also, if the annual gasoline throughput is known, a Tier I screening analysis for air toxics should be performed pursuant to the SCAQMD's "Risk Assessment Procedures for Rule 1401 and 212." This analysis is important given that the proposed gas station may be in close proximity to sensitive receptors (residences) that are part of the proposed project.