



South Coast
Air Quality Management District

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**Review of the Draft Environmental Impact Report (Draft EIR) for
Trailmark - General Plan Amendment No. 727; Specific Plan No. 344, Change of
Zone No. 7076; and Tentative Tract No. 35045**

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 either a Revised Draft or Final Environmental Impact Report (Final EIR) as appropriate.

The SCAQMD staff appreciates the fact that the lead agency allowed additional time in which to submit comments. 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,

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

Attachment

SN:DG

RVC090310-02
Control Number

Air Quality Analysis and Mitigation Measures:

1. On page 4.4-20 of the Draft EIR the lead agency proposes mitigation measure 4.4-2 which requires, where feasible, construction contractors to use aqueous or emulsified diesel fuel for all construction equipment. The lead agency also states that aqueous diesel formulations show a reduction of 16 percent in PM10 from diesel exhaust, however, given the uncertain availability of aqueous diesel fuels, SCAQMD staff requests that the lead agency provide verification that mitigation measure 4.4-2 is feasible by providing specific information on the type of aqueous fuel, the manufacturer, and the supplier. If the lead agency determines that mitigation measure 4.4-2 is infeasible SCAQMD staff recommends that the lead agency revise the regional and localized construction emissions analysis by removing the control efficiency associated with mitigation measure 4.4-2 or provide an alternative mitigation measure at least as efficient as mitigation measure 4.4-2.
2. In Section C (Localized Significance Thresholds) on page 4.4-7 of the Draft EIR the lead agency justifies its analysis of only five acres of disturbance to evaluate localized air quality impacts during the construction phase of the project; however, the lead agency does not include any provisions or requirements to limit the project's construction activity to only five acres per day. Therefore, SCAQMD staff requests that the lead agency require a mitigation measure that limits the project's construction activity to five acres or less per day.
3. In Appendix C of the Air Quality Analysis (Technical Appendix C) the lead agency modified the sample scenario developed by the SCAQMD to evaluate localized air quality impacts from construction activities. SCAQMD staff requests that the lead agency clarify these modifications by providing an explanation of the changes to the sample scenario and the assumptions used for the calculation. Also, based on the most current URBEMIS Model (URBEMIS2007) the maximum control efficiency to for the application of water three times per day is 61 percent, not 68 percent. Therefore, SCAQMD staff requests that the lead agency revise the construction emissions value to reflect a PM control efficiency of 61 percent and not 68 percent fugitive dust control efficiency for the utility and grading portions of the project's construction phase.
4. In the event that the lead agency's revised regional and/or localized construction emissions analysis requested in comment #1 and comment #3 demonstrates that any criteria pollutant emissions create new significant adverse impacts or make existing significant adverse impacts substantially greater, 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 EPA certified technologies,
- Require the use electricity from power poles rather than temporary diesel or gasoline power generators,
- Require construction parking to be configured such that traffic interference is minimized,
- 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.

In addition to the above NOx measures, SCAQMD staff recommends modifying the following existing mitigation measures as follows.

- 4.4-7 Prior to construction commencement and throughout project buildout, all onsite vehicles' and equipment emissions shall be controlled through regularly scheduled engine maintenance and low-emissions tune-ups according to manufacturers' specifications.
- 4.4-8 The construction contractor shall utilize low emission alternative fueled electric or diesel powered construction equipment in lieu of gasoline powered engines wherever feasible.
- 4.4-10 The construction contractor shall time ~~the~~ all construction activities so as not to interfere with peak hour traffic and minimize obstruction of through traffic lanes adjacent to the site. ~~If necessary~~ The construction contractor shall provide temporary traffic controls such as a flag person shall be retained by the construction supervisor to maintain safety adjacent to existing roadways during all phases of construction to maintain smooth traffic flow.

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:

- Require all trucks hauling dirt, sand, soil, or other loose materials to be covered,
- 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.
5. On pages 4.4-16 and 4.4-17 the lead agency discusses global climate change impacts by estimating that project operation will generate 90,500 pounds per day of CO₂ emissions. Construction CO₂ emissions are calculated in Appendix C, but CO₂ emissions are not summed for all construction emissions sources or reported in the text of the DEIR. Although the project includes some GHG reduction design features, control efficiencies are not quantified and applied to the applicable emissions sources. Finally, the lead agency states on page 4.4-17, "Because there are no established thresholds against which to make a significance determination for individual contributions to global climate change from project operations, a significant impact is not identified." OPR has clearly stated in its 6/19/2008 Technical Advisory that a significance determination should be made when analyzing GHG emissions. Similarly, the California Attorney General's Office has stated that the absence of a significance threshold does not relieve the lead agency from making a significance determination. Therefore, SCAQMD staff requests that the lead agency make a determination of significance for GHG emissions from the project, including construction GHG emissions.