South Coast
Air Quality Management District
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Draft Environmental Impact Report (Draft EIR) for the Proposed Diamond Specific Plan

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 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 – Inter-Governmental Review, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

Ian MacMillan
Program Supervisor, Inter-Governmental Review
Planning, Rule Development & Area Sources

Attachment

IM:GM

RVC100223-02
Control Number

Construction Air Quality Analysis

1. In the Section 4.2 Air Quality on pages 4.2-13 and in the Air Quality Impact Analysis, the lead agency discusses the need to import 231,000 cubic yards of fill material divided evenly between the three construction phases during grading. The lead agency also estimates that the soil import will also require approximately 1,200 miles per day of on-road truck travel during grading activities. The lead agency summarized the emission estimates for both the soil import and on-road truck travel in Table 4.2-6 Construction Daily Emissions Unmitigated and in Table 4.2-15 for Construction Daily Emissions Mitigated on pages 4.2-14 and 4.2-24. For the emission estimates for both the soil import and in both tables, the lead agency used the URBEMIS2007 computer land use model. Upon review of the modeling output sheets, it appears that the lead agency used the default level of detail to estimate fugitive dust emissions and on-road emissions instead of a level of greater detail, so these emissions were not accounted for in the URBEMIS modeling nor could estimates using other methodologies be found in the Draft EIR. In the Final EIR, the lead agency should estimate these emissions and revise the Final EIR as needed. Otherwise, the project construction emissions could be underestimated.

Project Length with Construction and Operations Overlapping

2. In Section 4.2 Air Quality on page 4.2-14, the proposed project is scheduled to begin construction in 2010 continuing for six years until 2015. Since operations will begin with Phase 1 in 2012, construction and operation air quality impacts will overlap beginning in 2012 until 2015. That could create the situation where on-going construction continues while portions of the project become operational causing construction and operation air quality impacts to overlap. If construction and operational phases will overlap, the construction activity could contribute more PM10 fugitive dust emissions to the combined total emissions with the remaining emissions, i.e., NOx, CO, SOx and PM10 (exhaust) sources being contributed from both short and long term activities substantially increasing total project emissions. The SCAQMD therefore recommends that the lead agency determine the worst-case construction and operational daily air quality impact scenario (seemingly the Phase 2 construction with the opening of Phase 1 for operations in 2012); total the construction and operational emission estimates together; and then compare those totals with the SCAQMD operational daily significance thresholds in the Final EIR. The reasoning is that the proposed six year construction period is a long period of time making the project emissions seemingly more long-term in nature. Therefore, the use of the more conservative operational daily significance thresholds approach would be more conservative than separating the emissions and comparing the short- and long-term estimates to the respective SCAQMD recommended daily significance thresholds.

Construction Mitigation Measures

3. In the event the lead determines that short-term construction air quality impacts exceed the SCAQMD daily significance thresholds for NOx, PM10 and PM2.5 (fugitive dust) (see comments #1 and #2), the SCAQMD recommends that the lead

agency consider the following modifications to construction mitigation measure DSP-AQ-1 on page 4.2-22, if applicable and feasible. In addition, the SCAQMD staff recommends the following additional mitigation measures to reduce applicable construction-related oxides of nitrogen emissions and particulate matter (fugitive dust), if applicable and feasible. Additional mitigation measures for consideration by the lead agency for off- and on-road engines and fugitive dust can be found at http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html .

Recommended changes:

- Apply soil stabilizers according to manufacturers' specifications to inactive areas (previously graded areas inactive for ten days or more).
- Prepare a high wind dust control plan and implement plan elements and terminate soil disturbance when winds (as instantaneous gusts) exceed 25 mph.

Recommended additions:

- If Tier 2 or Tier 3 off-road construction equipment is not available, require alternative fueled off-road equipment;
- Configure construction parking to minimize traffic interference;
- 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;
- 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;
- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site;
- Install wheel washers where vehicles enter and exit the construction site onto paved roads or wash off trucks and any equipment leaving the site each trip;
- All streets shall be swept at least once a day using SCAQMD Rule 1186 1186.1 certified street sweepers or roadway washing trucks if visible soil materials are carried to adjacent streets (recommend water sweepers with reclaimed water);
- All trucks hauling dirt, sand, soil, or other loose materials are to be covered; and
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation.