



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Draft Mitigated Negative Declaration (Draft MND) for the Proposed Fiesta De Vida Specific Plan

The 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 MND. The Lead Agency proposes to develop a 656.34 acre mixed use master planned community. The project comprises of 1,289 residential units, parks, open space, community centers, solar arrays, and utility corridors. The project is expected to be built out in three phases, with the final phase being completed in 2023.

The Lead Agency has determined that the project's air quality impacts would result in less than significant impacts during construction and operational activities. However, in Appendix A – Air Quality and Global Climate Impact Analysis – Section VIII – Long Term Air Quality Operation Impacts, the Lead Agency incorrectly used Mass Daily Construction Thresholds to determine Operational Air Quality Significance. Additionally, air quality impacts from operation are underestimated because the air quality analysis does not account for overlapping construction and operational phases. For example, operational emissions in year 2025 should include emissions from the operation of Phase 1, operation Phase 2, and construction Phase 3. SCAQMD staff recommends revising the air quality analysis to account for overlapping operation and construction phases and comparing the peak impacts to the correct SCAQMD's CEQA significance thresholds¹. Should the Lead Agency conclude after its revised analyses that construction or operational air quality impacts exceed the SCAQMD daily significance thresholds, SCAQMD staff recommends additional mitigation measures to further reduce the significant impacts. Details are included in the attachment.

The SCAQMD staff is available to work with the Lead Agency to address these concerns and any other air quality questions that may arise. Please contact Jack Cheng, Air Quality Specialist at (909) 396-2448, if you have any questions regarding these comments. We look forward to reviewing and providing comments for the Final MND associated with this project.

Sincerely,

Jillian Wong

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JW:JC
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Control Number

¹ <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>

Attachment

Recommended Changes

AQ-9: The project applicant shall require that 240-Volt electrical outlets or Level 2 chargers be installed in garages on-site that would enable charging of NEVs and/or battery powered vehicles.

Additional Construction Mitigation Measures

In an effort to further reduce air quality impacts during construction, SCAQMD staff recommends that the following measures be included to minimize or eliminate significant adverse air quality impacts:

- Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export) and if the lead agency determines that 2010 model year or newer diesel trucks cannot be obtained the lead agency shall use trucks that meet EPA 2007 model year NOx emissions requirements.
- Consistent with measures that other Lead Agencies in the South Coast Air Basin (including Port of Los Angeles, Port of Long Beach, Metro and City of Los Angeles)² have enacted, require all on-site construction equipment to meet the following:
 - All off road diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
 - A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.
 - Encourage construction contractors to apply for SCAQMD "SOON" funds. Incentives could be provided for those construction contractors who apply for SCAQMD "SOON" funds. The "SOON" program provides funds to accelerate clean up of off-road diesel vehicles, such as heavy duty construction equipment. More information on this program can be found at the following website:
<http://www.aqmd.gov/home/programs/business/business-detail?title=off-road-diesel-engines>.
- Provide temporary traffic controls such as a flag person, during all phases of significant construction activity to maintain smooth traffic flow.
- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site.
- Reroute construction trucks away from congested streets or sensitive receptor areas.
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation.
- Improve traffic flow by signal synchronization.
- Traffic speeds on all unpaved roads to be reduced to 15 mph or less.
- Construct or build with materials that do not require painting.
- Require the use of pre-painted construction materials.

² For example see the Metro Green Construction Policy at:
http://www.metro.net/projects_studies/sustainability/images/Green_Construction_Policy.pdf

For additional measures to reduce off-road construction equipment, refer to the mitigation measure tables located at the following website:

<http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>.

Additional Operational Mitigation Measures

In an effort to further reduce air quality impacts from operation, SCAQMD staff recommends that the following measures be included to minimize or eliminate significant adverse air quality impacts:

- Improve walkability design and pedestrian network.
- Increase transit accessibility and frequency by incorporating Bus Rapid Transit lines with permanent operational funding stream.
- Limit parking supply and unbundle parking costs. Lower parking supply below ITE rates and separate parking costs from property costs.
- Require use of electric lawn mowers and leaf blowers.
- Require use of electric or alternatively fueled sweepers with HEPA filters.