



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

November 21, 2018

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Mitigated Negative Declaration (MND) for the Proposed Menifee Meadows Medical Office Building and Assisted Living Project (CUP 2017-173, TPM 2017-174, and Plot Plan 2017-175)

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 CEQA document.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to construct seven medical offices and one general office, totaling 119,300 square feet, a 179,059-square-foot assisted living facility, a parking lot with 717 parking spaces and 226,861 square feet of open space (Proposed Project). The Proposed Project is located on the southeast corner of Sherman Road and Holland Road in the City of Menifee.

SCAQMD Staff's Summary of Air Quality Analysis

In the Air Quality Analysis section, the Lead Agency quantified the Proposed Project's construction and operational emissions and compared those emissions to SCAQMD's recommended regional and localized air quality CEQA significance thresholds. After incorporating mitigation measure AQ-1 Site Preparation and Grading PM Reduction, which requires disturbed soils within 25 meters of nearest residence have a moisture content of 15%, localized construction emissions would be less than significant¹. Upon review of the MND, SCAQMD staff has concerns that the proposed mitigation measure does not adequately mitigate localized air quality impacts during construction. Please see SCAQMD staff's detailed comment below.

SCAQMD Staff's Comments

The Lead Agency found that implementation of the proposed mitigation measure AQ-1 would reduce PM10 and PM2.5 emissions to 2.6 pounds per day and 1.9 pounds per day, respectively². However, as written, AQ-1 appears to only apply to disturbed soils within 25 meters of the nearest sensitive receptor. Although it is important to reduce the localized impact to sensitive receptors within 25 meters of the Proposed Project³, SCAQMD staff recommends that the Lead Agency revise AQ-1 as follows so that it applies to the entire site during site preparation and grading.

AQ-1 Site Preparation and Grading PM Reduction

Contractor will be conditioned to apply water to soils being actively disturbed during site preparation ~~occurring within 25 meters of the nearest residence~~ and grading activities such that the moisture content reaches 15%. Water shall be applied using an active sprinkler

¹ MND. AQ-GHG Appendices. Pages 9-13.

² *Ibid*, Page 11.

³ MND. AQ-GHG Appendices. Page 10.

system or water truck. The moisture content will be verified using a lab sample or moisture probe. Equipment operation within 25 meters of the nearest residence would operate no more than 4 hours per day during site preparation and grading.

Additionally, while the Proposed Project's PM2.5 localized emissions during construction were found to be below SCAQMD's localized significance thresholds after incorporation of mitigation measure AQ-1, the PM2.5 emissions were slightly below the thresholds⁴ and may still create a substantial impact to localized air quality. Therefore, SCAQMD staff recommends that the Lead Agency incorporate the following mitigation measure in the final MND and include the mitigation measure in applicable bid documents or contract specifications with contractors. Successful contractor(s) must demonstrate the ability to supply such equipment. The Lead Agency should also require periodic reporting and provision of written documents by contractors to prove and ensure compliance.

Tier 4 Construction Equipment or Level 3 Diesel Particulate Filters

To further reduce particulate matter emissions during construction and minimize their impacts on nearby residents, SCAQMD staff recommends that the Lead Agency use off-road diesel-powered construction equipment that meets or exceeds the CARB and USEPA Tier 4 off-road emissions standards for equipment rated at 50 horsepower or greater during Project construction. Such equipment will be outfitted with Best Available Control Technology (BACT) devices including a CARB certified Level 3 Diesel Particulate Filters (DPF). Level 3 DPFs are capable of achieving at least 85 percent reduction in particulate matter emissions⁵. A list of CARB verified DPFs are available on the CARB website⁶. A copy of each unit's certified tier specification or model year specification and CARB or SCAQMD operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment. In the event that construction equipment cannot meet the Tier 4 engine certification, the Project representative or contractor must demonstrate through future study with written findings supported by substantial evidence that is approved by the Lead Agency before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, construction equipment with Tier 3 emissions standards, reduction in the number and/or horsepower rating of construction equipment, limiting the number of daily construction haul truck trips to and from the Proposed Project, using cleaner vehicle fuel, and/or limiting the number of individual construction project phases occurring simultaneously.

Response to Comments

Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process. Please provide SCAQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, response should provide sufficient details giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful or useful to decision makers and the public who are interested in the Proposed Project.

⁴ LST for SRA 24, 2 Acre site at 25 meters is 4 pounds per day, Accessed at <http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/appendix-c-mass-rate-lst-look-up-tables.pdf>, Page C-11. Mitigated PM2.5 emissions from the proposed project are 3.4 pounds per day, CalEEMod Summer Output File, Page 15 of 33.

⁵ California Air Resources Board. November 16-17, 2004. *Diesel Off-Road Equipment Measure – Workshop*. Page 17. Accessed at: https://www.arb.ca.gov/msprog/ordiesel/presentations/nov16-04_workshop.pdf.

⁶ *Ibid*. Page 18.

SCAQMD staff is available to work with the lead agency to address any air quality questions that may arise from this comment letter. Please contact Alina Mullins, Assistant Air Quality Specialist, at amullins@aqmd.gov or (909) 396-2402, should you have any questions.

Sincerely,

Lijin Sun

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Planning, Rule Development & Area Sources

LS/AM
RVC181107-10
Control Number