



South Coast
Air Quality Management District

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E-MAILED: DECEMBER 30, 2010

December 30, 2010

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City of Menifee
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**Draft Environmental Impact Report (Draft EIR) No. 2010-04 for the Proposed
Fleming Ranch Project: Tentative Tract Map Nos. 34104 and 34105 (SCH
#2009091118)**

The South Coast Air Quality Management District (AQMD) 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.

In the project description, the lead agency includes proposed construction of a mixed-use development consisting of 1,501 residential units and up to 231,475 square feet of commercial office, commercial retail, and light industrial uses on a 333.6- total acre site. The 333.6 total acres would include 51,989 square feet of light industrial uses on 23.3- acres and an elementary school on 11.7 acres. The proposed project would involve up to 1.2 million cubic yards of earthwork volume and approximately 1.8 million cubic yards of remedial earthwork primarily from over-excavation. In total, about 2.7 million cubic yards of soil disturbance is estimated for the proposed project and the earthwork would be balanced on site.

AQMD staff is concerned that all feasible mitigation measures have not been considered to reduce the significant emissions associated with the extensive grading activities for this project. In addition to the mitigation measures listed by the lead agency starting on page 4.2-28, AQMD staff recommends that additional mitigation measures be considered that might reduce these emissions further. These additional measures are described in the detailed comments attached to this letter.

Pursuant to Public Resources Code Section 21092.5, please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final Environmental Impact Report. The AQMD staff is available to work with the Lead

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2

December 30, 2010

Agency to address these issues and any other air quality 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,

A handwritten signature in black ink, appearing to read "Ian V. MacMillan". The signature is written in a cursive, flowing style.

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

IM:GM

RVC101110-01
Control Number

Construction Mitigation Measures

- ❖ Because the lead agency has determined that construction phase emissions for oxides of nitrogen (NO_x), particulate matter (PM₁₀ and PM_{2.5}, fugitive dust), and volatile organic compounds (VOCs) exceed the established significance thresholds, the SCAQMD recommends the following modifications and additions to the mitigation measures listed starting on page 4.2-28 to further to reduce NO_x, PM₁₀, PM_{2.5}, and VOC emissions, if applicable and feasible. Additional construction mitigation measure suggestions can also be found at http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html:

Recommended Changes:

- MM 4.2-1 All clearing, grading, earth-moving, or excavation activities shall cease when winds (as instantaneous gusts) exceed 25 mph per SCAQMD guidelines in order to limit fugitive dust emissions
- MM 4.2-6 The following note shall be included on all grading plans: “During construction activity, the constructor shall utilize California Air Resources Board (CARB) Tier II certified equipment or better for ~~the following pieces of equipment: Rubber Tired Dozers, Rubber Tired Loaders and Serapers~~ all on-site construction equipment to meet EPA Tier 2 or higher emissions standards according to the following:”
- April 1, 2010, to December 31, 2011: All off-road diesel-powered construction equipment greater than 50 hp shall meet Tier 2 off-road emissions standards. In addition, all construction equipment shall be outfitted with the 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 2 or Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
 - January 1, 2012, to December 31, 2014: All off-road diesel-powered construction equipment greater than 50 hp shall meet Tier 3 off-road emissions standards. 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.
 - Post-January 1, 2015: 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 AQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.

For additional measures to reduce off-road construction equipment and other construction related emissions, the following mitigation measure tables are located at the following website:

www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html.

Recommended additions:

NO_x

- 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;
- 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; and
- All vehicles and equipment will be properly tuned and maintained according to manufacturers' specifications.

PM₁₀/PM_{2.5}

- Install wheel washers where vehicles enter and exit the construction site onto paved roads or wash off trucks or any equipment leaving the site each trip;
- All trucks hauling dirt, sand, soil, or other loose materials are to be covered;
- Pave road and road shoulders;
- Replace ground cover in disturbed areas as quickly as possible;

- Sweep streets at the end of the day if visible soil is carried onto adjacent public paved roads (recommend water sweepers with reclaimed water);
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.