



South Coast Air Quality Management District

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E-MAILED: MARCH 5, 2010

March 5, 2010

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Draft Environmental Impact Report (Draft EIR) for the Proposed Case 5.1154 Desert Palisades Specific Plan and Tentative Tract Map 35540

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.

SCAQMD staff notes that the lead agency appeared to only evaluate impacts to regional air pollution from these potentially significant activities, and not to localized impacts. Specifically, in Table 3.9-a (Surrounding Land Use Table) of the Draft EIR, the proposed project is located within one-quarter mile of sensitive receptors (residential properties). In the project description, the lead agency describes activities that would include dust and combustion emission impacts from the mass grading phase estimated to last six and a half months. During that time, soil disturbance, rock crushing and other activities are described to include up to 11,900 total truck trips for soil import; up to 1,362 total truck trips for the construction of the water reservoir tanks if an on-site rock crushing option were chosen; and up to 19,380 total truck trips if the off-site rock crushing option occurs. Therefore, the SCAQMD recommends that the lead agency follow SCAQMD guidance¹ and evaluate localized air quality impacts to ensure that any nearby sensitive receptors are not adversely affected by the construction activities that are occurring in close proximity. Should significant impacts be identified, additional feasible and applicable mitigation measures² for consideration by the lead agency for off- and on-road engines and fugitive dust should be considered.

Further, on page 99 of the Draft EIR, SCAQMD staff notes that one alternative includes onsite rock crushing that could reduce the number of truck trips required for the project. However, an analysis of potential emissions associated with this temporary rock crushing operation does not appear to be included in the Draft EIR. SCAQMD staff recommends that the lead agency present an analysis of these potential emissions in the Final EIR, and

¹ www.aqmd.gov/ceqa/handbook/LST/LST.html

² www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html


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provide mitigation measures should impacts be found significant. Further, reference should be made regarding compliance with SCAQMD Rule 2100 for any rock crushing operation.

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 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,

A handwritten signature in black ink that reads "Ian V. MacMillan". The signature is written in a cursive style with a large initial "I" and "M".

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

Attachment

IM:GM

RVC100122-03
Control Number