



# MONTEREY BAY

Unified Air Pollution Control District  
serving Monterey, San Benito, and Santa Cruz counties

AIR POLLUTION CONTROL OFFICER  
Douglas Quetin

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3/1/2004  
#10

February 26, 2004

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Thom McCue  
Monterey County Planning and Inspection Department  
2620 1<sup>st</sup> Avenue  
Marina, CA 93933

SUBJECT: DEIR FOR DEL MONTE FOREST PRESERVATION AND DEVELOPMENT  
PLAN

Dear Mr. McCue:

Staff has reviewed the referenced document and has the following comments:

1. Page 3.8-6. Construction project PM<sub>10</sub> emissions are estimated and mitigation measures proposed. Proposed mitigation measure 13 under Mitigation Measure AIR-C is inconsistent with the District's CEQA Guidelines which indicate that construction site activity in excess of 2.2 or 8.1 acres per day would exceed the District's threshold of significant for PM<sub>10</sub> of 82 lb/day. Emission calculations and justification for the limitation of 13 acres per day rather than 2.2 or 8.1 acres per day are not provided in an appendix. Please forward the calculations to the District for our review. 1
2. Page 3.8-8. The DEIR finds that diesel exhaust from construction equipment would have a significant impact and pose a risk to human health. This impact is not quantified based on the mistaken conclusion that the District does not have a threshold of significance for diesel exhaust. The District's CEQA Air Quality Guidelines state (page 9-3), "Construction equipment or processes would not result in significant air quality impacts if they would comply with Rule 1000. Equipment or processes not subject to Rule 1000 that emit non-carcinogenic TACs could result in significant impacts if emissions would exceed the threshold that is based on the best available data [i.e., acute (1-hour) REL, chronic (annual REL, PEL/420)]. The District should be contacted regarding the appropriate threshold. In addition, temporary emissions of a carcinogenic TAC that can result in a cancer risk greater than one incident per 100,000 population are considered significant". 2

The District communicated with the County's consultant numerous times. On April 10, 2002, the consultant provided data to the District so that we could make a preliminary assessment regarding the need for a risk assessment. On May 13, 2002, we sent a letter to the consultant stating that a risk assessment should be performed unless the operations are changed or the equipment retrofitted and if that occurred, we should be contacted

regarding the need for further assessment. On June 3, 2002, we stated that a risk assessment may not be necessary if: "1. All construction equipment and haul trucks are retrofitted with diesel particulate filters, or 2. other means are employed to eliminate or significantly reduce diesel emissions such as reduction in hours of operation. In either case, the District would be required to make a final determination if a risk assessment is needed." We had no subsequent communication with the consultant.

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The consultant has proposed mitigation measures without consultation with the District. Proposed Mitigation Measure AIR-C2 recommends that all construction equipment and trucks over 50 horsepower be retrofitted with either oxidation catalysts or catalytic particulate filters and use CARB-certified low-sulfur diesel fuel. Oxidation catalysts reduce diesel exhaust emissions by 30% while catalytic particulate filters achieve a 90% reduction. To assure that risks are reduced to acceptable levels, only the catalytic particulate filters should be used along with low sulphur fuel. If oxidation catalysts are used, a risk assessment should be undertaken.

3. The Ecological Management Plan for the Del Monte Forest includes provisions for prescribed burns. The FEIR should note that a District permit would be required to undertake these burns and that permit requirements would reduce impacts to less than significant.

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Thank you for the opportunity to review the document. Please do not hesitate to call if you have any questions.

Sincerely,



Janet Brennan  
Supervising Planner  
Planning and Air Monitoring Division