

February 27, 2023

City of Salinas
Community Development Department
Attn: Robert Latino
65 W. Alisal St. 2nd Floor
Salinas, CA 93901

SUBJECT: John and Abbott Street Mixed Use Development Project

Dear Mr. Latino

Thank you for providing the Monterey Bay Air Resources District (Air District) with the opportunity to comment on the Mitigated Negative Declaration for the John and Abbott Street Mixed Use Development Project. The Air District has reviewed the MND and has the following comments:

Air Quality

○ **Fugitive Dust Control**

- Fugitive dust can be further mitigated as well as maintaining compliance with MBARD Rule 402 (Nuisance) and CEQA Guidelines, Section 8.2 by implementing the following Best Management Practices as applicable:
 - Water all active construction areas at least twice daily. Frequency should be based on the type of operation, soil, and wind exposure.
 - Prohibit all grading activities during periods of high wind (over 15 mph).
 - Cover all trucks hauling dirt, sand, or loose materials.
 - Cover inactive storage piles.
 - Maintain at least 2'0" of freeboard in haul trucks.
 - Apply chemical soil stabilizers on inactive construction areas (disturbed lands within construction projects that are unused for at least four consecutive days).

Portable Construction Equipment

○ **Rule 201, Section 4.14**

- Per Rule 201, Section 4.14.1 (10/15/2014) any stationary IC engine greater than 50 HP must be permitted by the Air District or registered with the California Air Resources Board. For Engine-Generator sets, the engine will have a different rating, normally higher than the rating of the generator output. Please consult with the Air District Engineering Division if there are any questions regarding the permitting process.

○ **Notification**

- If project construction uses portable equipment registered with the California Air Resources Board (CARB) in the Portable Equipment Registration Program (PERP), MBARD must be notified within two working days of commencing operations when a

registered unit will be at a location for more than five days. Portable equipment not registered with CARB may be subject to MBARD permit requirements.

Green House Gas Emissions

○ Infrastructure Electrification

- The Air District suggests using guidance from the Bay Area Air Quality Management District or Sacramento Metropolitan Air Quality Management District for evaluating the project's greenhouse gas emissions for construction emissions.

The Air District supports incorporating electric vehicle infrastructure goals in the project plan. To achieve further emission reduction of criteria pollutants, emissions and greenhouse gases, the Air District suggests including publicly available dual port Level 2 & DC fast-charge charging stations throughout the project area.

Hazardous Materials

○ Asbestos Notification

- If any buildings are renovated or demolished as part of this project, Air District rules may apply. These include Rule 424, National Emissions Standards for Hazardous Air Pollutants and Rule 439, Building Removals. Rule 424 contains the investigation and reporting requirements for asbestos which includes surveys and advanced notification on structures being renovated or demolished. Notification to the Air District is required at least ten days prior to renovation or demolition activities. Rule 424 could also apply if old underground piping or other asbestos containing construction materials are encountered during trenching activities. District Rule 439 prohibits the release of any visible emissions from building removals. Rules 424 and 439 can be found online at <https://ww2.arb.ca.gov/current-air-district-rules>. Please contact Shawn Boyle, Air Quality Compliance Inspector III, at (831) 718-8010 for more information regarding these rules.

Transportation/Traffic

○ Traffic Emission Reduction

- In an effort to improve congestion and minimize traffic emissions, the Air District strongly supports the consideration of the following inclusions at street intersections surrounding the project site:
 - Include roundabout design and construction as an alternative mitigation.
 - Include the use of currently available Adaptive Traffic Control Systems (ATCS) for existing or new signalized intersections.

For funding opportunities for congestion management projects, please contact Tyrone Bell in the Planning Division at (831) 718-8023.

I appreciate the opportunity to comment on the MND for the John and Abbott Street Mixed Use Development Project. Please let me know if you have any questions. I may be reached at (831) 718-8030 or eballaron@mbard.org.

Best Regards,



Edward Ballaron
Air Quality Planner I

cc: David Frisbey