



# South Coast Air Quality Management District

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Mr. Richard C. Ayala, Senior Planner  
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Ontario, CA 91764

## **Draft Environmental Impact Report (Draft EIR) for the Proposed West Haven Specific Plan (PSP03-006)**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The SCAQMD would also like to thank the lead agency for the additional time to submit comments. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final Environmental Impact Report.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD 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 – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

Susan Nakamura  
Planning & Rules Manager  
Planning, Rule Development & Area Sources

Attachment

SN:GM

SBC060720-07  
Control Number

## **Air Quality Analysis**

### **Architectural Coatings**

1. On page 6 of the URBEMIS 2002 output sheets in Volume II under construction, the lead agency has changed the pounds of ROG per 1000 square feet default value for architectural coatings for residential and non-residential uses from 0.0185 to 0.000834 without an explanation to support the lower emission factor. In the Final EIR, the lead agency should include an explanation to support the lower value or revise the modeling using the default value of 0.0185.
2. The SCAQMD recommends that the lead agency consider the following mitigation measure, if feasible, to reduce VOC emissions from construction activities should the lead agency's estimates of VOC emission impacts prove to be significant:

#### Recommended Additions:

1. Contractors shall use high-pressure-low-volume (HPLV) paint applicators with a minimum transfer efficiency of at least 50%.
2. Use required coatings and solvents with a VOC content lower than required under Rule 1113.
3. Construct/build with materials that do not require painting
4. Use pre-painted construction materials.

### **Availability of Low Emission Technologies**

3. On page 6 of the URBEMIS 2002 output sheets in Volume II under construction, the lead agency has switched on mitigation measures including cooled exhaust recirculation (EGR) and diesel particulate filters to reduce emissions from construction equipment. It is recommended that the lead agency investigate the availability of cooled EGR, diesel particulate filters, lean NOx catalysts, and diesel oxidation catalysts and demonstrate that they are available for the proposed project. Currently, the availability of these technologies is relatively limited, so they may not be available for use by the project proponent. Until the lead agency can demonstrate the availability of the low emission technologies, the lead agency should turn off these mitigation measures in the URBEMIS2002 computer model and not take credit for control efficiencies associated with them.

In addition, should the lead agency determine that these low emission technologies are available, the lead agency should formally adopt any mitigation measures that is included in the URBEMIS2002 computer model's emission estimates and list these adopted measures in the Final EIR along with the other measures listed in Volume I on page 3-19.

### Localized Significance Thresholds

4. Because the proposed site is located less than a quarter-mile from existing single-family residences (page 2-1 in Volume I of the Draft EIR), a localized air quality analysis may be warranted to ensure that the residents in those existing land uses are not adversely affected by the construction activities that are occurring in close proximity. SCAQMD guidance for performing a localized air quality analysis can be found at the following web address:  
<http://www.aqmd.gov/ceqa/handbook/LST/LST.html> .

### Mitigation Measures - Construction

5. In addition to the short-term (construction) mitigation measures proposed in Volume I on pages 3-18 and 3-19, the SCAQMD recommends that the lead agency consider modifying the following mitigation measure and consider additional mitigation measures to further reduce construction oxides of nitrogen (NOx) and PM10 fugitive dust air quality impacts from the project, if applicable and feasible:

#### Recommended Changes:

- Identification of disturbed portions of the Project's construction site expected to remain inactive for longer than a period of ~~three months~~ ten days. These portions shall ~~be~~ have non-toxic soil stabilizers applied according to manufacturers' specifications or be seeded or watered until grass cover is grown.
- All clearing, grading, earth moving, or excavation activities shall cease during periods of high winds (winds greater than 25 mph as instantaneous gusts averaged over one hour), or during Stage 1 or Stage 2 air quality episodes.
- Pavement of all on-site roads shall occur as soon as feasible. In the interim they shall be watered periodically or chemically stabilized. Additionally, all adjacent streets shall be cleared using SCAQMD Rule 1186 certified street sweepers or roadway washing trucks (i.e. recommend street sweepers with reclaimed water).

#### PM10 – Recommended Additions:

- Install wheel washers where vehicles enter and exit the construction site onto paved roads or wash off trucks and any equipment leaving the site each trip.
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation.

NO<sub>x</sub> – Recommended Additions:

- Prohibit all diesel trucks from idling in excess of five minutes, both on- and off-site;
- All vehicles and equipment will be properly tuned and maintained according to manufacturers' specifications;
- 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.
- Reroute construction trucks away from congested streets or sensitive receptor areas.
- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site.
- Use clean construction equipment; emulsified diesel fuels; construction equipment that uses low sulfur diesel and is equipped with oxidation catalysts, particulate traps, or other retrofit technologies, etc.

**CO Hotspot Analysis**

6. On pages 3-112 to 3-116 in Volume I of the Draft EIR (Off-Site Project Mitigation), the lead agency has shown the projected results from the influence of mitigation measures on the intersections listed in the Draft EIR that have shown a decline in service in the PM Peak Hour that would warrant a CO hotspots analysis. The lead agency, however (see comment #7), has stated on page 3-113 that the decision whether the payment of proportionate share or installation of the improvements is required shall be made at a future time (at the time of Tentative Tract Map approval) therefore leaving the proposed measures potentially unfunded and unscheduled to be implemented. Without having formally adopted and funded these proposed measures, the lead agency should take the more conservative approach and not take credit for those measures in determining whether a potential for a CO hotspots exists. Based on future traffic impacts with and without the proposed project, the following intersections listed below have shown a decline in service in the AM and PM Peak Hours that would warrant a CO hotspots analysis. The SCAQMD recommends performing the CO hotspots analysis if the volume to capacity ratio increases by two percent or more as a result of a proposed project for intersections rated D or worse.

- Archibald Avenue at SR-60 EB Ramps shows an increase in V/C of three percent during the PM peak hour;
- Archibald Avenue at Chino Avenue shows an increase in V/C of 11 percent during the PM peak hour;
- Archibald Avenue at Edison Avenue shows an increase in V/C of three percent during the AM peak hour;

- Haven Avenue at Riverside Drive shows a decline in LOS from C to D during the AM peak hour and a seven percent increase in V/C during the PM peak hour;
- Haven Avenue at New Edison Avenue shows an eight percent increase in V/C during the AM peak hour;