



**South Coast  
Air Quality Management District**  
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February 17, 2016

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**Addendum to the Edgewater Communities Environmental Impact Report (EIR)**

The South Coast Air Quality Management District (SCAQMD) staff 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 Addendum to the EIR. The Project proposes amend the General Plan and The Preserve Specific Plan for approximately 271 acres of land to eliminate the water oriented residential development concept, reduce the total number of residential dwelling units from 1,074 to 823, and to re-distribute the land use designations.

In the Edgewater Communities Final EIR (certified on May 5, 2009), the air quality impacts from NO<sub>x</sub> and PM during construction were found to be significant and unavoidable. Additionally, operational air quality impacts will exceed the recommended regional daily significance threshold for VOC, NO<sub>x</sub>, CO, and PM. The proposed construction and operational emissions would be similar to the impacts in the Edgewater Communities Final EIR and continue to be significant and unavoidable. Therefore, SCAQMD staff recommends additional mitigation measures to reduce the air quality impacts. Please see the attachment for more information.

The SCAQMD staff is available to work with the Lead Agency to address these concerns and any other air quality questions that may arise. Please contact Jack Cheng, Air Quality Specialist at (909) 396-2448, if you have any questions regarding these comments. We look forward to reviewing and providing comments for the Addendum associated with this project.

Sincerely,

*Jillian Wong*

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JW:JC  
SBC160205-04  
Control Number

## Attachment

### **Additional Construction Mitigation Measures**

Based on the air quality analysis in the Addendum to the EIR, the Lead Agency determined that the proposed Project will result in significant regional air quality impacts during construction. Specifically, the air quality analysis demonstrated that the proposed Project will exceed the SCAQMD's CEQA regional construction significance thresholds for NO<sub>x</sub> and PM. Therefore, SCAQMD staff recommends that, pursuant to Section 15126.4 of the CEQA Guidelines, the following measures be included in the Addendum to the EIR, in addition to the measures proposed by the lead agency, in order to minimize or eliminate significant adverse air quality impacts:

- Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export) and if the lead agency determines that 2010 model year or newer diesel trucks cannot be obtained the lead agency shall use trucks that meet EPA 2007 model year NO<sub>x</sub> emissions requirements.
- Consistent with measures that other Lead Agencies in the South Coast Air Basin (including Port of Los Angeles, Port of Long Beach, Metro and City of Los Angeles)<sup>1</sup> have enacted, require all on-site construction equipment to meet the following:
  - 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 SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.
  - Encourage construction contractors to apply for SCAQMD "SOON" funds. Incentives could be provided for those construction contractors who apply for SCAQMD "SOON" funds. The "SOON" program provides funds to accelerate clean up of off-road diesel vehicles, such as heavy duty construction equipment. More information on this program can be found at the following website:  
<http://www.aqmd.gov/home/programs/business/business-detail?title=off-road-diesel-engines>.
- Provide temporary traffic controls such as a flag person, during all phases of significant construction activity to maintain smooth traffic flow.
- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site.
- Reroute construction trucks away from congested streets or sensitive receptor areas.
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM<sub>10</sub> generation.
- Improve traffic flow by signal synchronization.
- Traffic speeds on all unpaved roads to be reduced to 15 mph or less.
- Construct or build with materials that do not require painting.
- Require the use of pre-painted construction materials.

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<sup>1</sup> For example see the Metro Green Construction Policy at:  
[http://www.metro.net/projects\\_studies/sustainability/images/Green\\_Construction\\_Policy.pdf](http://www.metro.net/projects_studies/sustainability/images/Green_Construction_Policy.pdf)

For additional measures to reduce off-road construction equipment, refer to the mitigation measure tables located at the following website:

<http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>.

### **Additional Operational Mitigation Measures**

Based on the air quality analysis in the Addendum to the EIR, the Lead Agency determined that the proposed Project will result in significant unavoidable regional air quality impacts during operation. Specifically, the air quality analysis demonstrated that the proposed Project will exceed the SCAQMD's CEQA regional operational significance thresholds for VOC, NO<sub>x</sub>, CO, and PM. Therefore, SCAQMD staff recommends that, pursuant to Section 15126.4 of the CEQA Guidelines, the following measure be included in the Addendum to the EIR, in addition to the measures proposed by the Lead Agency, in order to minimize or eliminate significant adverse air quality impacts:

- Vehicles that can operate at least partially on electricity have the ability to substantially reduce the significant NO<sub>x</sub> impacts from this project. It is important to make this electrical infrastructure available when the project is built so that it is ready when this technology becomes commercially available. The cost of installing electrical charging equipment onsite is significantly cheaper if completed when the project is built compared to retrofitting an existing building. Therefore, the SCAQMD staff recommends the lead agency require the proposed project to be constructed with the appropriate infrastructure to facilitate sufficient electric charging for vehicles to plug-in. The SCAQMD staff recommends that the lead agency require at least 5% of all vehicle parking spaces include EV charging stations. At a minimum, electrical panels should appropriately sized to allow for future expanded use.
- Improve walkability design and pedestrian network.
- Increase transit accessibility and frequency by incorporating Bus Rapid Transit lines with permanent operational funding stream.
- Limit parking supply and unbundle parking costs. Lower parking supply below ITE rates and separate parking costs from property costs.