



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Mitigated Negative Declaration (MND) for the Everett Street Project (ENV-2016-1040)

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comment is meant as guidance for the Lead Agency and should be incorporated into the Final MND.

In the project description, the Lead Agency proposes to construct two residential buildings containing a total of 50 units. In the air quality analysis, the Lead Agency found that regional and localized construction emissions would be significant. Based on a review of the CalEEMod modeling output in ENV-2016-1040-B, the SCAQMD staff found that Tier 4 for all construction equipment was used to calculate the mitigated construction emissions from NO_x, PM₁₀, and PM_{2.5} as substantial evidence to support the Lead Agency's finding that construction emissions would be less than significant. Although the MND included MM-3-1, which requires the use of Tier 4 for all off-road construction equipment greater than 50 hp, the requirement is triggered only when Tier 4 is available. Therefore, the SCAQMD staff determines that the Lead Agency does not commit itself to using Tier 4 for all construction equipment. Additionally, the Lead Agency does not specify performance standards or criteria for how to determine availability. To ensure that air quality impacts from NO_x, PM₁₀, and PM_{2.5} are adequately mitigated, and to be consistent with the air quality modeling assumption, the SCAQMD staff recommends that the Lead Agency commit itself to using Tier 4 for all off-road construction equipment greater than 50 hp and revise the MM-3-1 as follows:

MM-3-1: All off-road construction equipment greater than 50 hp shall meet U.S. EPA Tier 4 emission standards, ~~where available~~, to reduce NO_x, PM₁₀, and PM_{2.5} emissions at the project site.

The MND also included MM-3-2, which requires the use of 2010 or newer diesel haul trucks if the Lead Agency can obtain them; otherwise, the 2007 model year will be used. Based on a review of the California Air Resources Board's diesel truck regulations¹, 2010 model year diesel haul trucks should have already been available and can be obtained in a successful manner for the project construction. Therefore, the SCAQMD staff believes that the Lead Agency should take this opportunity to require the use of 2010 model year or newer diesel haul trucks and revise MM-3-2 as follows:

¹ California Air Resources Board. March 2016. Available at:

<http://www.truckload.org/tca/files/ccLibraryFiles/Filename/000000003422/California-Clean-Truck-and-Trailer-Update.pdf>

MM-3-2: 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 require trucks that meet U.S. EPA 2007 model year NOx emissions requirements.~~

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.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

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Planning, Rule Development & Area Sources

LS:JC

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