



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 Proposed Hamner Avenue Bridge Replacement Project

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 final CEQA Document.

SCAQMD Staff's Summary of Project Description

The lead agency proposes the reconstruction and widening of a 0.7 mile section of the existing Hamner Avenue Bridge (proposed project). The proposed project is located on Hamner Avenue, between Detroit Street and Citrus Street, in Norco. Construction of the proposed project is expected to occur over a 34-month time period.

SCAQMD Staff's Summary of Air Quality Analysis

In the air quality analysis, the lead agency quantified emissions resulting from construction and operation of the proposed project and compared those emissions to SCAQMD's air quality CEQA significance thresholds. Upon review of the air quality analysis, SCAQMD staff found that the lead agency quantified emission reductions resulting from mitigation measures. However, SCAQMD staff is concerned about the enforceability of these measures. Detailed comments are provided below.

General Comments

The lead agency determined that implementation of mitigation measure AQ-1 and AQ-2 will reduce NOx emissions resulting from grading activities during construction of the proposed project to a level that is less than significant. Pursuant to CEQA guidelines 15126.4(2), "Mitigation measures must be fully enforceable through permit conditions, agreements, or other legally binding instruments." Therefore, SCAQMD staff has recommended changes to AQ-1 to strengthen the enforceability of the measure.

Additionally, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate these impacts. Therefore, SCAQMD staff recommends that the lead agency incorporate an additional mitigation measure in the final EIR, to further reduce the project's VOC emissions.

Recommended Change to Existing Mitigation Measure

~~AQ-1: The construction contractor will reduce emissions of NOX by 20 percent relative to the South Coast Air Basin fleetwide averages for the types of construction equipment used during the grading phase. This could be achieved by implementing one or more of the following, or other methods:~~

- ~~• Use of NOX filters for all off road construction equipment.~~
- ~~• Use of Tier 4 compliant off road construction equipment.~~

- ~~Use of newer construction equipment and vehicles.~~
- ~~Extension of the grading/excavation phase such that per day emissions would be below SCAQMD regional mass emissions thresholds.~~

AQ-1 During the grading phase of the proposed project, the construction contractor shall reduce emissions of NOX by 20 percent relative to the South Coast Air Basin fleetwide averages by requiring:

- the use of newer construction equipment,
- construction equipment rated at 50 horsepower or more to meet or exceed the Tier 4 off-road equipment standards,
- all on-road haul trucks meet or exceed the 2010 emissions standards,
- the use of level 3 diesel particulate filters (DPF)
- the construction contractor to keep and maintain records of construction equipment details and specifications, which shall be available by request for inspection by the city.

Additional Recommended Mitigation Measure

AQ-3 The project shall utilize “Super-Compliant” low volatile organic compounds (VOC) paints which have been reformulated to exceed the regulatory VOC limits put forth by South Coast Air Quality Management District (SCAQMD) Rule 1113. Super-Compliant low VOC paints shall be no more than 50 grams per liter of VOC. Alternatively, the Applicant may utilize tilt-up concrete buildings that do not require the use of architectural coatings.

Permits and Compliance with SCAQMD Rules

In the event that the proposed project requires a permit from the SCAQMD, the SCAQMD should be identified as a responsible agency for the proposed project. For more information on permits, please visit SCAQMD webpage at: <http://www.aqmd.gov/home/permits>. Questions on permits can be directed to SCAQMD’s Engineering and Permitting staff at (909) 396-3385.

Conclusion

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the final CEQA Document. The SCAQMD staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Robert Dalbeck, Assistant Air Quality Specialist - CEQA IGR Section, at rdalbeck@aqmd.gov, if you have any questions regarding these comments.

Sincerely,

Daniel Garcia

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Planning, Rule Development & Area Sources

DG/RD

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