



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Draft Environmental Impact Report (Draft EIR) for the Proposed Mental Health Crisis Facility Project (SCH No. 2018072022)

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 EIR.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to demolish 12,420 square feet of existing buildings and construct a 47,000-square-foot mental health treatment facility with 50 beds on three acres. The Proposed Project is located at 14901 Central Avenue near the southeast corner of Central Avenue and Eucalyptus Avenue in the City of Chino.

SCAQMD Staff's Summary of Air Quality Analysis

In the Air Quality Analysis section, the Lead Agency quantified the Proposed Project's construction and operational emissions and compared those emissions to SCAQMD's recommended regional and localized air quality CEQA significance thresholds. Based on the analyses, the Lead Agency found that the Proposed Project's regional construction and operational air quality impacts would be less than significant. Based on the Localized Significance Thresholds (LSTs) Analysis, the Lead Agency found that localized PM10 emissions would be less than significant at 6 pounds per day (lbs/day)¹.

Recommended Mitigation Measure for Localized Air Quality Impacts from Construction

CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse air quality impacts. While the Proposed Project's localized PM10 emissions during construction (i.e., approximately 6 lbs/day) did not exceed SCAQMD's localized air quality CEQA significance threshold for two acres with sensitive receptors at 25 meters in Source Receptor Area 33 (Southwest San Bernardino Valley), they would be equal to the applicable LST, resulting in substantial localized emissions. Therefore, in order to further reduce the PM10 emissions resulting from the use of off-road diesel-powered construction equipment, and to ensure that nearby sensitive receptors are not adversely affected by the PM10 emissions from the construction activities that are occurring in close proximity, SCAQMD staff recommends that the Lead Agency incorporate the following mitigation measure into the Final EIR.

Tier 4 Construction Equipment or Level 3 Diesel-Particulate Filters

To further reduce particulate matter emissions during construction and minimize their impacts on nearby residents, SCAQMD staff recommends that the Lead Agency require the use off-road diesel-powered

¹ Draft EIR. 4.2.3 Impacts and Mitigation Measures. Table 4.2-4 *Summary of Modeled Daily Emissions of Criteria Air Pollutants and Precursors from Construction (Unmitigated)*. Page 4.2-12.

construction equipment rated at 50 horsepower or greater that meets or exceeds the CARB and U.S. EPA Tier 4 off-road emissions standards. Such equipment will be outfitted with Best Available Control Technology (BACT) devices including a CARB certified Level 3 Diesel Particulate Filters (DPFs). Level 3 DPFs are capable of achieving at least 85 percent reduction in particulate matter emissions². A list of CARB verified DPFs are available on the CARB website³. To ensure that Tier 4 or Level 3 DPF construction equipment or better will be used during the Proposed Project construction, SCAQMD staff recommends that the Lead Agency include this requirement in applicable bid documents, purchase orders, and contracts. Successful contractor(s) must demonstrate the ability to supply the compliant construction equipment for use prior to any ground disturbing and construction activities. A copy of each unit's certified tier specification or model year specification and CARB or SCAQMD operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment. Additionally, the Lead Agency should require periodic reporting and provision of written construction documents by construction contractor(s) to ensure compliance, and conduct regular inspections to the maximum extent feasible to ensure compliance. In the event that construction equipment cannot meet the Tier 4 engine certification, the Construction Contractor must demonstrate through future study with written findings supported by substantial evidence that is approved by the Lead Agency before using Tier 3 emissions standards compliant construction equipment and/or other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, reduction in the number and/or horsepower rating of construction equipment, limiting the number of daily construction haul truck trips to and from the Proposed Project using cleaner vehicle fuel, and/or limiting the number of individual construction project phases occurring simultaneously.

Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), SCAQMD staff requests that the Lead Agency provide SCAQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful or useful to decision makers and to the public who are interested in the Proposed Project.

SCAQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Alina Mullins, Assistant Air Quality Specialist, at amullins@aqmd.gov or (909) 396-2402, should you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

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Planning, Rule Development & Area Sources

LS:AM

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Control Number

² California Air Resources Board. November 16-17, 2004. *Diesel Off-Road Equipment Measure – Workshop*. Page 17. Accessed at: https://www.arb.ca.gov/msprog/ordiesel/presentations/nov16-04_workshop.pdf.

³ *Ibid*. Page 18.