



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 Etiwanda Heights Neighborhood and Conservation Plan (SCH No.: 2017091027)

South Coast Air Quality Management District (South Coast AQMD) 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.

South Coast AQMD Staff's Summary of Project Description

The Lead Agency proposes to construct 3,000 residential units, 180,000 square feet of commercial and retail uses, and 450 acres of open space on 828 acres (Proposed Project). The Proposed Project will also include annexation of 4,088 acres from County of San Bernardino to the City of Rancho Cucamonga. The Proposed Project is located on the northeast corner of Base Line Road and Haven Avenue within the City of Rancho Cucamonga. Construction is anticipated to take place in nine phases over 13 years, with construction beginning in 2023 and lasting through 2035¹; however, over time individual phases may overlap or develop concurrently². The Proposed Project will be designed to meet the Title 24 Energy Efficiency Standards for Residential and Nonresidential Buildings³.

South Coast AQMD 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 South Coast AQMD's recommended regional and localized air quality CEQA significance thresholds. Based on the analyses, the Lead Agency found that, if the project is developed in one phase (i.e. concurrent development), regional VOC and NOx emissions would exceed South Coast AQMD's regional air quality CEQA significance thresholds at 90 pounds per day (lbs/day) and 149 lbs/day, respectively⁴. With the implementation of Mitigation Measure (MM) AQ-1 and MM AQ-2, the Proposed Project's regional construction NOx emissions would be reduced from 149 lbs/day to 69 lbs/day. Additionally, implementation of MM AQ-2 would reduce regional construction VOC emissions from 90 lbs/day to 73 lbs/day. MM AQ-1 and AQ-2 require that construction equipment greater than 50 horsepower (hp) meet Tier 3 off-road emissions standards and that development be phased and occur in nine phases over approximately 13 years to minimize concurrent development⁵. The Lead Agency also found that the Proposed Project's regional operational air quality impacts would be significant and unavoidable⁶ and cumulatively considerable⁷ for VOC, NOx, CO, PM10, and PM2.5 emissions, after the incorporation of MM AQ-3 through MM AQ-5⁸. MM AQ-3 through AQ-5 require

¹ Draft EIR. Appendix C Air Quality. CalEEMod EHNCP (Proposed Project) "Overall Construction" Annual, Summer, and Winter runs.

² Draft EIR. Section 2 Project Description. Page 2.0-28.

³ Draft EIR. Section 4.2 Air Quality. Page 4.2-29.

⁴ *Ibid.* Pages 4.2-27 through 28.

⁵ *Ibid.* Pages 4.2-35 through 4.2-36.

⁶ *Ibid.* Page 4.2-36.

⁷ *Ibid.*

⁸ *Ibid.* Pages 4.2-33 through 4.2-36.

preferential parking for clean air vehicles, posting signage to reduce truck idling in excess of five minutes, and conducting a project-specific Health Risk Assessment (HRA) to disclose health impacts of locating housing developments within close proximity to high traffic volume roadways⁹.

South Coast AQMD's 2016 Air Quality Management Plan

On March 3, 2017, South Coast AQMD's Governing Board adopted the 2016 AQMP¹⁰, which was later approved by the California Air Resources Board (CARB) on March 23, 2017. Built upon the progress in implementing the 2007 and 2012 AQMPs, the 2016 AQMP provides a regional perspective on air quality and the challenges facing the South Coast Air Basin. The most significant air quality challenge in the Basin is to achieve an additional 45 percent reduction in nitrogen oxide (NOx) emissions in 2023 and an additional 55 percent NOx reduction beyond 2031 levels for ozone attainment.

South Coast AQMD Staff's General Comments

South Coast AQMD staff has comments on the Air Quality Analysis. The Proposed Project would be constructed in nine phases over a period of 13 years; however, the Lead Agency did not analyze an overlapping construction and operational emissions scenario. Additionally, while the Proposed Project's construction NOx emissions would be reduced to less than significant with the implementation of MMs AQ-1 and AQ-2, the Lead Agency should revise MM AQ-1 to ensure that the lowest emission technologies, such as engines that are rated at Tier 4 off-road emissions standards or better, will be used. Please see the attachment for more information.

As described in the 2016 AQMP, achieving NOx emissions reductions in a timely manner is critical to attaining the National Ambient Air Quality Standard (NAAQS) for ozone before the 2023 and 2031 deadlines. South Coast AQMD is committed to attaining the ozone NAAQS as expeditiously as practicable. The Proposed Project plays an important role in contributing to additional NOx emissions during operation. Therefore, South Coast AQMD staff recommends that the Lead Agency incorporate additional mitigation measures, including the use of zero-emissions or near-zero emission material delivery trucks to serve the commercial and retail uses of the Proposed Project, in the Final EIR to further reduce operational criteria pollutants emissions. Please see the attachment for more information.

Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), South Coast AQMD staff requests that the Lead Agency provide South Coast AQMD 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, informative, or useful to decision makers and to the public who are interested in the Proposed Project. Further, when the Lead Agency makes the finding that the recommended revisions and new mitigation measures are not feasible, the Lead Agency should describe the specific reasons for rejecting them in the Final EIR (CEQA Guidelines Section 15091).

South Coast AQMD 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.

⁹ *Ibid.*

¹⁰ South Coast AQMD. March 3, 2017. *2016 Air Quality Management Plan*. Accessed at: <http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan>.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment

LS:AM

SBC190507-01

Control Number

ATTACHMENT**Air Quality Impact Analysis – Overlapping Construction and Operational Impacts**

1. Based on a review of the Air Quality Analysis, South Coast AQMD staff found that the Lead Agency did not consider nor analyze a scenario where construction activities overlap with operational activities (e.g., one phase of the Proposed Project is operational while another phase or phases are under construction). Since implementation of the Proposed Project is expected to occur in nine phases over a multi-year timeframe of 13 years from 2019 to 2035¹¹, and a phased-development is an air quality mitigation measure (MM AQ-2), it is more than likely and reasonably foreseeable that construction and operation of various development phases may overlap, unless the Lead Agency includes a project development condition to require concurrent development since potential air quality impacts from concurrent development have already been analyzed and disclosed in the Draft EIR. This project development condition will avoid an overlapping construction and operational scenario; otherwise, to conservatively analyze a worst-case impact scenario that is reasonably foreseeable at the time the Draft EIR is prepared, South Coast AQMD staff recommends that the Lead Agency use its best efforts to identify the overlapping construction and operational years, combine construction emissions (including emissions from demolition) with operational emissions, and compare the combined emissions to South Coast AQMD's air quality CEQA *operational* thresholds of significance to determine the level of significance in the Final EIR.

Recommended Revisions to Existing Mitigation Measure AQ-1

2. The Lead Agency has committed to implementing MM AQ-1 through MM AQ-5 to reduce the Proposed Project's air quality impacts from construction and operation. MM AQ-1 requires that construction equipment rated at 50 horsepower or greater meet Tier 3 off-road emissions standards. In combination with MM AQ-2, which requires phased development of the Proposed Project, NOx emissions would be reduced to less than significant¹².

Technology is transforming the environmental and land use planning sectors at a rapid pace. Since the Proposed Project will be implemented over a period of 13 years, and to ensure that the lowest emission technologies will be used throughout the Project implementation, South Coast AQMD staff recommends that the Lead Agency revise MM AQ-1 as follows to allow engines that are rated at Tier 4 or better will and can be used. Additionally, South Coast AQMD staff recommends that the Lead Agency include more specific details to demonstrate the Lead Agency's commitment to enforcing the mitigation measure.

MM AQ-1

All off-road diesel-powered construction equipment greater than 50 horsepower (hp) shall meet ~~Tier 3~~ or exceed Tier 4 off-road emissions standards. In addition, all construction equipment shall be outfitted with Best Available Control Technology (BACT) devices certified by the California Air Resources Board (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 Particulate Filter (DPF) for a similarly sized engine as defined by CARB regulations. The Lead Agency should include this requirement in applicable bid documents, and successful contractor(s) must demonstrate the ability to supply compliant equipment prior to the commencement of any construction activities. Additionally, the Lead Agency should require periodic reporting and provision of written documentation by contractors to ensure compliance, and conduct regular inspections to the maximum extent feasible to ensure compliance. In the event that the Lead Agency finds that Tier 4 construction equipment is not

¹¹ Draft EIR. Appendix C Air Quality. CalEEMod EHNCP (Proposed Project) "Overall Construction" Annual, Summer, and Winter runs

¹² *Ibid.* Pages 4.2-35 through 4.2-36.

feasible pursuant to CEQA Guidelines Section 15364, the Project representative or contractor must use all off-road, diesel-powered construction greater than 50 hp that meets Tier 3 off-road emission standards and other technologies/strategies approved by the Lead Agency. 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, and/or limiting the number of individual construction project phases occurring simultaneously, if applicable.

Additional Recommended Mitigation Measures

3. In the event, upon revisions to the Air Quality Analysis based on Comment No.1, the Lead Agency finds that the Proposed Project would result in significant adverse air quality impacts from overlapping construction and operational phases, mitigation would be required (CEQA Guidelines Section 15126.4.). Additionally, 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. To further reduce the Proposed Project's air quality impacts during the potentially concurrent construction phases and the significant and unavoidable operational emissions from VOC, NO_x, CO, PM₁₀, and PM_{2.5}, South Coast AQMD staff recommends the following mitigation measures as suggested resources and guidance that the Lead Agency should review for incorporation in the Final EIR.

Mitigation Measures for Construction Air Quality Impacts

- Maintain equipment maintenance records for the construction portion of the Proposed Project. All construction equipment must be tuned and maintained in compliance with the manufacturer's recommended maintenance schedule and specifications. All maintenance records for each equipment and their construction contractor(s) should be made available for inspection and remain on-site for a period of at least two years from completion of construction.
- Encourage construction contractors to apply for South Coast AQMD "SOON" funds. The "SOON" program provides funds to applicable fleets for the purchase of commercially-available low-emission heavy-duty engines to achieve near-term reduction of NO_x emissions from in-use off-road diesel vehicles. More information on this program can be found at South Coast AQMD's website: <http://www.aqmd.gov/home/programs/business/business-detail?title=off-road-diesel-engines>.

Mitigation Measures for Operational Air Quality Impacts from Mobile Sources

- Require the use of zero-emissions (ZE) or near-zero emission (NZE) trucks (e.g., material delivery, heavy-duty trucks for the commercial and retail uses at the Proposed Project) such as heavy-duty trucks with natural gas engines that meet the CARB's adopted optional NO_x emissions standard at 0.02 grams per brake horsepower-hour (g/bhp-hr). CARB also adopted the statewide Truck and Bus Regulation in 2010. The Regulation requires diesel trucks and buses that operate in California to be upgraded to reduce emissions. Newer heavier trucks and buses must meet particulate matter filter requirements beginning January 1, 2012. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent¹³. Since the construction schedule of the Proposed Project extends into 2035, it is reasonable to assume that 2010 model year trucks will become more widely available commercially. Therefore, South Coast AQMD staff recommends that the Lead Agency, at a minimum, require that construction vendors, contractors, and/or haul truck operators commit to using 2010 model year or newer engines that meet CARB's 2010

¹³ California Air Resources Board. December 20, 2018. <https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm>.

engine emissions standards at 0.01 g/bhp-hr of particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks. When requiring ZE or NZE on-road haul trucks, the Lead Agency should include analyses to evaluate and identify sufficient power and supportive infrastructure available for ZE/NZE trucks in the Energy and Utilities and Service Systems Sections of the Final EIR, where appropriate. Additionally, the Lead Agency should require that operators maintain records of all trucks associated with the Proposed Project's construction and make these records available to the Lead Agency upon request. The records will serve as evidence to prove that each truck called to the Proposed Project meets the minimum 2010 model year engine emission standards. The Lead Agency should conduct regular inspections of the records to the maximum extent feasible and practicable to ensure compliance with this mitigation measure.

- Provide incentives for employees working at the proposed commercial and retail uses to encourage the use of public transportation or carpooling, such as discounted transit passes or carpool rebates.
- Implement a rideshare program for employees working at the proposed commercial and retail uses and set a goal to achieve a certain participation rate over a period of time.

Mitigation Measures for Operational Air Quality Impacts from Area Sources

- Maximize the use of solar energy including solar panels. Installing the maximum possible number of solar energy arrays on the building roofs and/or on the Proposed Project site to generate solar energy for the commercial and retail facilities and/or EV charging stations at each residential building and nonresidential building.
- Require the use of electric landscaping equipment, such as lawn mowers and leaf blowers.
- Require the use of electric or alternatively fueled sweepers with HEPA filters.
- Maximize the planting of trees in landscaping and parking lots.
- Use light colored paving and roofing materials.
- Utilize only Energy Star heating, cooling, and lighting devices, and appliances.