



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

September 17, 2019

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Draft Environmental Impact Report/Environmental Assessment (Draft EIR/EA) for the Proposed Grove Avenue Corridor Project

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/EA.

South Coast AQMD Staff's Summary of Project Description

The Lead Agency proposes to widen Grove Avenue from four lanes to six lanes between Fourth Street and State Street/Airport Drive to provide consistency of access and mobility along Grove Avenue between Interstate 10 and Holt Boulevard (Proposed Project). Based on a review of aerial photographs, South Coast AQMD staff found that portions of the Proposed Project will be located in close proximity to existing residential uses.

South Coast AQMD Staff's Summary of the Air Quality Analysis

In the air quality analysis section, the Lead Agency quantified the Proposed Project's regional and localized construction emissions and compared those emissions to South Coast AQMD's recommended regional and localized air quality CEQA significance thresholds for construction. Based on the analysis, the Lead Agency found that the Proposed Project's regional construction air quality impacts would be less than significant. However, construction of the Proposed Project would result in 16.9 pounds per day (lbs/day) of PM₁₀ emissions, which would exceed South Coast AQMD's localized construction air quality CEQA significance threshold for PM₁₀ at 6 lbs/day¹. The Lead Agency requires implementation of two standard conditions with a list of air quality control measures to reduce PM₁₀ emissions during construction². As a result, the Lead Agency stated that "impacts would be temporary and considered less than significant³."

South Coast AQMD Staff's Comments – Recommended Mitigation Measures during Construction

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 significant adverse impacts. While the Lead Agency requires implementation of air quality control measures to reduce PM₁₀ emissions during construction, the Draft EIR/EA did not quantify the Proposed Project's construction PM₁₀ emissions after implementation as substantial evidence to support that the Proposed Project's localized construction air quality impacts would be less than significant. To further reduce the Proposed Project's localized air quality impacts during construction on nearby residences, South Coast AQMD staff has identified the following air quality mitigation measures during construction that the Lead Agency should review and incorporate in the Final EIR/EA.

¹ Draft EIR/ES. Page 3-7.

² *Ibid.* Page 3-8.

³ *Ibid.*

- a. Require the use of zero-emission or near-zero emission heavy-duty haul trucks during construction, such as trucks with natural gas engines that meet the California Air Resources Board's (CARB) adopted optional NOx emissions standard of 0.02 grams per brake horsepower-hour (g/bhp-hr). At a minimum, require that operators of heavy-duty haul trucks visiting the Proposed Project during construction commit to using 2010 model year⁴ or newer engines that meet CARB's 2010 engine emission standards of 0.01 g/bhp-hr for particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks. Include analyses to evaluate and identify sufficient power available for zero emission trucks and supportive infrastructures in the Energy and Utilities and Service Systems Sections of the Final EIR/EA, where appropriate. Require that contractor(s) maintain records of all trucks visiting the Proposed Project 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 during construction 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.
- b. Limit the daily number of truck trips allowed at the Proposed Project to levels analyzed in the Final EIR/EA. If higher daily truck volumes are anticipated to visit the Proposed Project, the Lead Agency should commit to re-evaluating the Proposed Project through CEQA prior to allowing the higher activity level.
- c. Require the use of off-road diesel-powered construction equipment that meets or exceeds the CARB and U.S. Environmental Protection Agency (USEPA) Tier 4 Final off-road emissions standards for equipment rated at 50 horsepower or greater during construction of the Proposed Project. Such equipment will be outfitted with Best Available Control Technology (BACT) devices including a CARB certified Level 3 Diesel Particulate Filter (DPFs). Level 3 DPFs are capable of achieving at least 85 percent reduction in particulate matter emissions⁵. A list of CARB verified DPFs are available on the CARB website⁶.
- d. To ensure that Tier 4 Final construction equipment or better would be used during the Proposed Project's construction, South Coast AQMD 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 South Coast AQMD 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.
- e. In the event that construction equipment cannot meet the Tier 4 Final engine certification, the Project representative or contractor must demonstrate through future study with written findings supported by substantial evidence that is approved by the Lead Agency before using other

⁴ CARB 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 equivalent. More information on the CARB's Truck and Bus Regulations is available at: <https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.html>.

⁵ CARB. 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.

⁶ *Ibid*. Page 18.

technologies/strategies. Alternative applicable strategies may include, but would not be limited to, construction equipment with Tier 4 Interim or Tier 3 emission standards that the Lead Agency has already included in the air quality modeling, 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 construction phases occurring simultaneously with the remediation activities.

- f. Maintain vehicle and equipment maintenance records for the construction portion of the Proposed Project. All construction vehicles must be maintained in compliance with the manufacturer's recommended maintenance schedule. All maintenance records shall remain on-site for a period of at least two years from completion of construction.
- g. 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 NOx 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>.

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/EA. 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 mitigation measures are not feasible, the Lead Agency should describe the specific reasons for rejecting them in the Final EIR/EA (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. If you have any questions regarding this letter, please contact me at lsun@aqmd.gov.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA-IGR

Planning, Rule Development & Area Sources

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SBC190820-04
Control Number