



South Coast Air Quality Management District

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Mr. Richard C. Ayala, Senior Planner
City of Ontario, Planning Department
303 East "B" Street
Ontario, CA 91764

Draft Environmental Impact Report (Draft EIR) for the Proposed Esperanza Specific Plan Project

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The SCAQMD would also like to thank the lead agency for the additional time to submit comments. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final Environmental Impact Report.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final Environmental Impact Report. The SCAQMD staff would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

Steve Smith, Ph.D.
Program Supervisor, CEQ Section
Planning, Rule Development & Area Sources

Attachment

SS:GM

SBC060811-01
Control Number

Air Quality Impact Analysis

1. It is not clear from the Draft EIR or the URBEMIS output file whether or not the lead agency accounted for emissions from removing one foot of topsoil from the dairy site. If not, it is recommended the lead agency calculate the fugitive dust, construction equipment, and haul truck emissions and add them to total daily site grading emissions.
2. In the URBEMIS2002 computer model output sheets for construction, the lead agency has switched on the following mitigation measures during Phase 2 Building Construction but did not include those measures with the measures adopted in Section I – EIR Issues Matrix on pages I-3-1 to I-3-5 or under Mitigation Measures on page 27 of the Air Quality Impact Analysis:
 - Apply soil stabilizers to inactive areas
 - Replace ground cover in disturbed areas quickly

Until the lead agency formally adopts these measures and includes them in the list of adopted mitigation measures, the lead agency should not take credit for those emission reductions in the URBEMIS2002 modeling and revise the estimated maximum peak daily construction emissions in the Final EIR .

Mitigation Measures - Construction

3. In addition to the short-term (construction) mitigation measures proposed in Section I – EIR Issues Matrix on pages I-3-1 to I-3-4, the SCAQMD recommends that the lead agency consider modifying the following mitigation measures and consider additional mitigation measures to further reduce construction carbon monoxide (CO), oxides of nitrogen (NO_x), and volatile organic compounds (VOC) air quality impacts from the project, if applicable and feasible:

Recommended Changes:

- MM Air 7: During the grading and all site disturbances activities, ~~at the discretion of the City's Planning Director,~~ construction contractors shall suspend all grading operations during first and second stage smog alerts to reduce fugitive dust and combustion related emissions.
- MM Air 8: During the grading and all site disturbances activities, ~~at the discretion of the City's Planning Director,~~ construction contractors shall suspend all grading operations when wind speeds (including instantaneous gusts) exceed 25 miles per hour to reduce fugitive dust.
- MM Air 9: During all construction activities, the construction contractors shall maintain construction equipment engines by keeping them tuned according to manufacturers' specifications.

- MM Air 11: During construction, all contractors will be advised to prohibit all vehicles from idling in excess of ~~ten~~ five minutes, both on-site and off-site.
- MM Air 5: During all construction activities, construction contractors shall sweep on and off site streets (recommend water sweepers with reclaimed water) if ~~silt~~ visible soil is carried over to adjacent public thoroughfares, as determined by the City Engineer to reduce the amount of particulate matter on public streets.

Recommended Additions:

- Contractors shall use high-pressure-low-volume (HPLV) paint applicators with a minimum transfer efficiency of at least 50% or other application techniques with equivalent or higher transfer efficiency.
 - Use architectural coatings with a VOC content lower than required under Rule 1113.
 - Construct/build with materials that do not require painting
 - Use pre-painted construction materials.
 - Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow.
 - Reroute construction trucks away from congested streets or sensitive receptor areas.
 - Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site.
 - Require construction equipment that meet or exceed Tier 2 standards; use emulsified diesel fuels; and equip construction equipment with oxidation catalysts, particulate traps, or other verified/certified retrofit technologies, etc.
4. Should the lead agency, after final review (see comments #1 and #2), determine that the short-term (construction) air quality impacts from the proposed project are estimated to exceed established daily significance thresholds for particulate matter (PM10) fugitive dust, the SCAQMD recommends that the lead agency consider adding additional mitigation measures to further reduce construction air quality impacts from the project, if applicable and feasible:
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation.
 - All trucks hauling dirt, sand, soil, or other loose materials are to be covered;
 - Apply water three times daily, or non-toxic soil stabilizers according to manufacturers' specifications, to all unpaved parking or staging areas or unpaved road surfaces; and
 - Pave road and road shoulders.