



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

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cortlieb@cityoforange.org

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Mr. Chad Ortlieb
City of Orange, Planning Division
300 East Chapman Avenue
Orange, CA 92866

Review of the Draft Environmental Impact Report (Draft EIR) for the Rio Santiago Project

The South Coast Air Quality Management District (SCAQMD) 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 environmental impact report (Final EIR) as appropriate.

Significant Construction Related Air Quality Impacts

The proposed project requires a substantial amount of grading activity during construction, specifically, the project calls for over 3.3 million cubic yards of material to be blended during project site grading (including the backfilling operation and mass grading). As a result, the lead agency determined that the project will exceed SCAQMD's regional and localized CEQA significance thresholds during construction. Based on Table 5.3-8 of the Draft EIR the project will exceed the SCAQMD's CEQA regional construction significance threshold for NO_x emissions. Further, based on Table 5.3-11 the proposed project will exceed the SCAQMD's localized significance thresholds for PM₁₀ and PM_{2.5} emissions. These significant localized emissions impacts could disproportionately affect residents surrounding the project site. Therefore, the lead agency should consider additional mitigation to minimize the project's air quality impacts to local residents and the region. Pursuant to Section 15126.4 of the CEQA Guidelines the SCAQMD staff recommends that the lead agency require the following mitigation measures in addition to the measures identified in the Draft EIR.

Construction Equipment Mitigation (Regional NO_x and Localized PM Emissions)

- a) Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export) and if the lead agency determines that 2010 model year or newer diesel trucks cannot be obtained the lead agency shall use trucks that meet EPA 2007 model year NO_x emissions requirements.

- b) Consistent with measures that other lead agencies in the region (including Port of Los Angeles, Port of Long Beach, Metro and City of Los Angeles)¹ have enacted, require all on-site construction equipment to meet EPA Tier 3 or higher emissions standards according to the following:
- ✓ Project start, to December 31, 2014: All offroad diesel-powered construction equipment greater than 50 hp shall meet Tier 3 offroad emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by 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 emissions control strategy for a similarly sized engine as defined by CARB regulations.
 - ✓ Post-January 1, 2015: All offroad diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by 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 emissions control strategy for a similarly sized engine as defined by CARB regulations.
 - ✓ A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.
 - ✓ Encourage construction contractors to apply for SCAQMD "SOON" funds. Incentives could be provided for those construction contractors who apply for SCAQMD "SOON" funds. The "SOON" program provides funds to accelerate clean up of off-road diesel vehicles, such as heavy duty construction equipment. More information on this program can be found at the following website:
<http://www.aqmd.gov/tao/Implementation/SOONProgram.htm>

For additional measures to reduce off-road construction equipment, refer to the mitigation measure tables located at the following website:

www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html.

Fugitive Dust Mitigation (PM10 Emissions)

- a) Consistent with Table 4 of SCAQMD Rule 403² require unpaved roads (e.g., scraper roads) to comply with conservation management practices (4b) and (4c).
- b) Require frequent street sweeping surrounding the project site to minimize fugitive dust emissions from track-out. All street sweeping shall use alternatively fueled

¹ For example see the Metro Green Construction Policy at:

http://www.metro.net/projects_studies/sustainability/images/Green_Construction_Policy.pdf

² <http://www.aqmd.gov/rules/reg/reg04/r403.pdf>

sweepers that are equivalent to those specified in SCAQMD Rules 1186 and 1186.1.

Applicable SCAQMD Rules and Regulations

As a reminder, if onsite crushing or screening of oversized materials is performed, permits may be needed. In addition to the rules mentioned in Section 5.3 (Air Quality) of the Draft EIR, the SCAQMD staff recommends that the lead agency review the final project and ensure that it complies with all SCAQMD rules and regulations. The project proponent should call Mr. Rodney Millican at (909) 396-2591 to discuss potential permit requirements for this project. Finally, the lead agency should provide SCAQMD with a copy of the final project conditions required to ensure enforcement of the project's proposed mitigation measures (e.g., mitigation and monitoring report, development agreement and other requirements).

SCAQMD Contact Information

Pursuant to Public Resources Code Section 21092.5, SCAQMD staff requests that the lead agency provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. Further, staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,



Ian MacMillan
Program Supervisor, CEQA Inter-Governmental Review
Planning, Rule Development & Area Sources

IM:DG

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