



**South Coast
Air Quality Management District**
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SENT VIA E-MAIL AND USPS:
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**Draft Environmental Impact Report (DEIR) for the
Riverwalk Residential Development 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 CEQA document.

In the project description, the Lead Agency proposes the construction a 10.56-acre gated residential community containing 131 detached single family homes. In the Air Quality Section, the Lead Agency quantified the project's construction and operation air quality impacts and compared those impacts with the SCAQMD's recommended regional and localized daily significance thresholds. Based on its analyses, the Lead Agency has determined that construction air quality impacts will exceed the recommended regional daily threshold for NO_x and the localized significance thresholds for PM₁₀ and PM_{2.5}. The Lead Agency will implement construction mitigation to reduce NO_x, PM₁₀, and PM_{2.5} to less than significant levels by restricting the construction equipment use. The SCAQMD staff recommends additional mitigation measures that could be used to also reduce PM and NO_x emissions. Please see the attachment for more information.

The Lead Agency notes that the proposed residences will be sited near the Union Pacific tracks. These residences would be sited approximately 10 feet north of the tracks. Because of the close proximity to the existing tracks, residents would be exposed to diesel particulate matter, which is a toxic air contaminant. The SCAQMD staff therefore recommends that the Lead Agency conduct a mobile source health risk assessment (HRA)¹ to disclose the potential health risks to the residents from trains that use the railroad.

¹ "Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis"
Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>

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 Jack Cheng, Air Quality Specialist, at (909) 396-2448, if you have any questions regarding the enclosed comments.

Sincerely,

Jillian Wong

Jillian Wong, Ph.D.

Program Supervisor

Planning, Rule Development & Area Sources

Attachment

JW:JC

LAC-150506-04

Control Number

Additional Construction Mitigation Measures (NOx)

Based on a review of the DEIR, the Lead Agency determined that with mitigation measures, the proposed project will not result in significant regional air quality impacts during construction. SCAQMD staff recommends the following additional mitigation measures be incorporated into the proposed project and FEIR to further reduce project impacts in addition to the measures included in the DEIR.

- All off-road diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission 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.
- Alternatively, the Lead Agency could rely on the Green Construction Policy used by LA County Metro or the ports of Los Angeles/Long Beach. These policies include provisions to ‘step down’ from Tier 4 equipment to Tier 3 or Tier 2 if specified criteria are met.
- 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 NOx emissions requirements.
- 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.