



# South Coast Air Quality Management District

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May 27, 2015

Mr. Alex Hamilton, Director  
Planning and Community Development  
City of Montebello  
1600 W. Beverly Boulevard  
Montebello, CA 90640

## **Final Environmental Impact Report (FEIR) for the Proposed Montebello Hills Specific Plan (MHSP) Project (SCH NO. 2008011122)**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned FEIR. The following comments are meant as guidance for the lead agency and should be incorporated into the Final CEQA document.

SCAQMD staff is concerned about the potential air quality impacts of placing residences in close proximity to oil and gas operations envisioned with this project. Over the last five years, the 477 oil and gas production facilities in the South Coast Air Basin have generated approximately 400 odor complaints. Therefore, SCAQMD staff recommends that the lead agency consider maximizing the distance between the future residents of the MHSP and the oil and gas production activities (e.g., using open space, parking lots, etc.) when projects are proposed within the Specific Plan in order to decrease the chances of odor complaints and the risks associated with upset events.

In the FEIR, the existing oil and gas operations will be modified to include development of 86 production and injection wells on five well pads with some oil and gas production activities occurring adjacent to the future residents of the MHSP Project. The FEIR included a revised analysis of the potential health risks to future residents based on this assumed level of oil and gas production activities. SCAQMD staff could not identify any enforceable limits to oil and gas development and maintenance activities in the Draft MHSP and EIR. Without these limits, it is possible that future oil and gas activity could occur at greater levels and in different locations than was analyzed in the EIR. SCAQMD staff is therefore concerned that the EIR could be underestimating potential air quality and health risk impacts to future residents of the MHSP.

Finally, to address significant air quality impacts during construction, the Lead Agency should consider utilizing or adopting construction mitigation measures (e.g., by requiring the use of low-emitting construction equipment and trucks) that are consistent with

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measures adopted by other lead agencies<sup>1</sup>. An important component of the cited “Green Construction Policy” is the provision to use the lowest emitting equipment available, and if that is unavailable, using the next lowest emitting equipment. Please see the attachment for more information.

The SCAQMD staff is available to work with the Lead Agency to address these issues and any other air quality 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,

*Jillian Wong*

Jillian Wong, Ph.D.  
Program Supervisor  
Planning, Rule Development & Area Sources

Attachment

JW:GM

LAC150414-04  
Control Number

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<sup>1</sup> Los Angeles County Metropolitan Transportation Authority, July 21, 2011:  
<http://www.metro.net/about/search/?q=green%20construction%20policy>

### **Buffer Zones between MHSP and Oil and Gas Production Activities**

Due to the risk of odors or liquids from planned or unplanned releases events, the SCAQMD staff recommends that the Lead Agency include a buffer zone or setback requirement in the MHSP between the residential areas and oil and gas production activities to reduce the potential impacts from these activities.

The SCAQMD staff further recommends that contingency measures be included for the on-going oil and gas production operations for instances when oil and gas operation odors are released or an upset occurs. At a minimum, these contingency measures should address odor complaints.

### **Construction Mitigation**

Since the lead agency has estimated that construction impacts will exceed the SCAQMD's recommended construction significance threshold for NO<sub>x</sub>, the SCAQMD staff recommends the following changes to further reduce significant air quality impacts:

#### Mitigation Measure AQ-1

The construction contractor shall ensure that off-road construction equipment engines utilize Tier 3 or better engines, or other equivalent methods approved by the CARB, to reduce air emissions. After January 1, 2015, all off-road diesel-powered construction equipment greater than 50 horsepower (hp) shall meet the Tier 4 emission standards at a minimum, where available. In addition, if not already supplied with a factory-equipped diesel particulate filter, all construction equipment shall be outfitted with Best Available Control Technology (BACT) devices certified by CARB. Any emissions control device used by the Contractor shall achieve emission 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.