



South Coast

Air Quality Management District

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E-MAILED: DECEMBER 17, 2010

December 17, 2010

Mr. Harry Persaud, Division Manager,
Lapataproject@ocpw.ocgov.com
County of Orange,
Department of Public Works, Planned Communities
300 North Flower Street
Santa Ana, CA 92703

**Draft Environmental Impact Report (Draft EIR) for the
Proposed La Pata Avenue Gap Closure and Camino Del Rio
Extension Project (SCH No. 2005061051)**

The South Coast Air Quality Management District (AQMD) 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 substantial earthwork including cut and fill for the proposed roadway project, soil stabilization for the Prima Deshecha Landfill, and remedial earthwork to stabilize roadway cut slopes. Total disturbance including the cut and fill, soil stabilization and excavation would include approximately 9 million cubic yards of the earthwork balanced onsite. In addition, 4.2 million cubic yards of balanced remedial earthwork would be required including soil removal in the canyon areas for roadway fills and buttress fills to stabilize roadway cut slopes

AQMD staff is concerned that all feasible mitigation measures have not been considered to reduce the significant emissions associated with the extensive grading activities for this project. Additional mitigation measures that might reduce these emissions are described in the detailed comments attached to this letter.

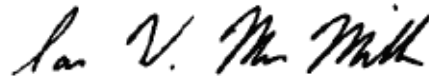
Pursuant to Public Resources Code Section 21092.5, please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final Environmental Impact Report. The AQMD staff is available to work with the Lead Agency to address these issues and any other air quality 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.

Mr. Harry Persaud,
Division Manager

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December 17, 2010

Sincerely,

A handwritten signature in black ink that reads "Ian V. MacMillan". The signature is written in a cursive, slightly slanted style.

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

IM:GM

ORC101103-07
Control Number

Construction Mitigation Measures

Because the lead agency has determined that construction phase emissions for carbon monoxide (CO), oxides of nitrogen (NOx), particulate matter (PM10 and PM2.5, fugitive dust), and volatile organic compounds (VOCs) exceed the established significance thresholds, the SCAQMD recommends the following modifications and additions to the mitigation measures listed starting in the Draft EIR on page 4.3-24 (Air Quality Section) to further to reduce CO, NOx, PM10, PM2.5, and VOC emissions, if applicable and feasible. Additional construction mitigation measure suggestions can also be found at

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

Recommended changes:

Mitigation Measure (MM) 4.3-3

- Prior to commencement of grading activities, the County Director of Public Works or designee shall ensure that construction documents require the construction contractor to select the construction equipment used on site based on low-emission factors and high energy efficiency. Prior to commencement of grading activities, the County Director of Public Works or designee shall also verify that all construction equipment is tuned and maintained in accordance with manufacturer specifications.
- Consistent with measures that other lead agencies in the region (including Port of Los Angeles and Port of Long Beach) have enacted, require all on-site construction equipment to meet EPA Tier 2 or higher emissions standards according to the following:
 - April 1, 2010, to December 31, 2011: All off-road diesel-powered construction equipment greater than 50 hp shall meet Tier 2 off-road emissions standards. In addition, all construction equipment shall be outfitted with the 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 2 or Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
 - January 1, 2012, to December 31, 2014: All off-road diesel-powered construction equipment greater than 50 hp shall meet Tier 3 off-road 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 off-road 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 AQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.

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.

Mitigation Measure (MM) 4.3-4

- Prior to issuance of a Notice to Proceed, the County Director of Public Works or designee shall verify that construction contracts and/or grading plans include a statement that construction contracts and/or grading plans include a statement that work crews will shut off equipment when not in use, prohibit vehicle and engine idling in excess of five minutes, and ensure that all off-road equipment is compliant with the California Air Resources Board's (CARB) in-use off-road diesel vehicle regulation and SCAQMD Rule 2449.

Recommended additions:

NOx

- Use electricity from power poles rather than temporary diesel or gasoline power generators;
- Configure construction parking to minimize traffic interference;
- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site; and
- Reroute construction trucks away from congested streets or sensitive receptor areas.

PM10/PM2.5

- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation.