



South Coast
Air Quality Management District

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Los Angeles County
Mr. Anthony Curzi, acurzi@planning.lacounty.gov
Department of Regional Planning
Impact Analysis Section, Room 1348
320 West Temple Street
Los Angeles, CA 90012

**Draft Environmental Impact Report (Draft EIR) for the Proposed Canyon
Residences Project in Rowland Heights (SCH#2008061035)**

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.

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 EIR. 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,

A handwritten signature in black ink that reads "Ian V. MacMillan".

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

Attachment

IM:GM

LAC100915-03
Control Number

Air Quality Analysis - Overlapping Construction Phases

1. Under Section 2.0 Project Description on page 3.0-28, the lead agency states that the proposed project will be constructed in several phases occurring over a 36-month period and that some phases may overlap with other phases. In other tables in the Draft EIR, however, (Table 3.0-4 Project Construction Phasing and Table 5.4-9 Estimated Unmitigated Project Construction Emissions), the phasing assumes no overlapping activities. For clarification purposes, the lead agency might want to clarify in the Final EIR which, if any, of the construction phases will overlap. If there is overlap, then the estimates for the overlapping phases should be combined and compared to the SCAQMD's recommended daily significance thresholds as a worst-case estimate. The applicable tables should then be revised in the Final EIR.

Construction Mitigation Measures

2. Starting on page 5.4-32, the lead agency lists construction Mitigation Measure 5.4-9 followed by a list of requirements from SCAQMD Rule 403 – Fugitive Dust shown on pages 5.4-32 through 5.4-35. Since complying with a rule, regulation, law, etc., should not be considered as mitigation if it is required, the lead agency should therefore identify the specific mitigation measures from Rule 403 that it will implement during construction activities and include those measures in the Final EIR.
3. Because the lead agency has determined that short-term (construction) air quality impacts from the proposed project are estimated to exceed established daily significance thresholds for nitrogen oxides (NO_x) and particulate matter PM10 and PM2.5 (fugitive dust), the SCAQMD recommends that the lead agency consider modifying the following mitigation measures and adding additional mitigation measures to further reduce construction air quality impacts from the project, if applicable and feasible:

Recommended changes:

The following changes are recommended for the proposed Mitigation Measure, to reduce fugitive dust:

5.4-6 The Contractor shall use on-site electricity or alternative fuels rather than diesel-powered or gasoline-powered generators ~~if suitable equipment is commercially available and the necessary power and refueling infrastructure can reasonably be installed on site.~~

5.4-7 ~~The Project Applicant shall require on-site off-road construction equipment to meet EPA Tier 3 emissions standards (Model Year 2006 or later) at a minimum. This requirement will apply to any piece of equipment which is expected to operate on-site more than 15 days.~~

- 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 air quality impacts, refer to the mitigation measure tables located at the following website: www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html.

Recommended additions:

Mitigation Measures for NO_x:

- Configure construction parking to minimize traffic interference;
- Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow;
- 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.

Mitigation Measures for PM10 and PM2.5 (fugitive dust):

- Install wheel washers where vehicles enter and exit the construction site onto paved roads or wash off trucks and any equipment leaving the site each trip;
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation;
- Apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more);
- Replace ground cover in disturbed areas as quickly as possible;
- Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 mph;
- Water active sites at least twice daily;
- 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;
- Pave road and road shoulders;
- Traffic speeds on all unpaved roads to be reduced to 15 mph or less; and
- Sweep streets at the end of the day if visible soil is carried onto adjacent public paved roads (recommend water sweepers with reclaimed water).

Additional mitigation measures to reduce off-road construction equipment from NOx and fugitive dust are located in the mitigation measure tables located at the following website: www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html.