



**South Coast
Air Quality Management District**
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL AND USPS:
OCEIToroProject@ocgov.com

December 9, 2016

Eric Hull
County of Orange, CEO/Real Estate/Land Development
333 W. Santa Ana Blvd., Third Floor
Santa Ana, CA 92701

**Draft Environmental Impact Report (DEIR) for the
100-Acre Parcel Development Plan**

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 to redevelop a 100-acre property formerly part of the El Toro Marine Corps Air Station. The project proposes to construct 2,103 dwelling units, a 242 room hotel, 220,000 square feet of commercial space, and 1,876,000 square feet of multi-use office space. 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 operational air quality impacts will exceed the recommended regional daily threshold for VOC, NO_x, CO, PM₁₀, and PM_{2.5}. 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 BNSF and Southern California Regional Rail Authority train 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

ORC161104-04

Control Number

Attachment

1. Based on a review of the DEIR, the Lead Agency determined that with mitigation measures, the proposed project will result in significant regional air quality impacts during construction and operation. 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.

Construction Mitigation Measures

Based on the estimated significant regional and localized construction impacts, the SCAQMD staff recommends the following additional measures to further reduce those impacts:

2. Since the Project is considered a large operation (50 acre sites or more of disturbed surface area; or daily earth-moving operations of 3,850 cubic yards or more on three days in any year) in the South Coast Air Basin, the Lead Agency is required to comply with all SCAQMD Rule 403(e) – Additional Requirements for Large Operations. This may include but not limited to Large Operation Notification, appropriate signage, additional dust control measures, and employment of a dust control supervisor that has successfully completed the Dust Control in the South Coast Air Basin training class. Therefore, the Final EIR should contain a detailed description of how the Project will comply with [Rule 403\(e\)](#). Please contact dustcontrol@aqmd.gov for more information.
 - Additional requirements include but are not limited to:
 - Implementation of Table 2 of Rule 403 at all times and implementation of the actions specified in Table 3 of Rule 403 when applicable.
 - Submittal of a fully executed Large Operation Notification to the Executive Officer.
 - Maintenance of daily records to document the specific dust control actions taken.
 - Installation and maintenance of project signage with project contact person that meets the minimum standards of Rule 403 Implementation Handbook.
 - Identification of a dust control supervisor that has completed the AQMD Fugitive Dust Control Class.

DR AQ-3

- All off-road diesel-powered construction equipment greater than 50 horsepower (hp) shall meet the Tier 3 & 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.

DR AQ-4

- 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.

Operational Mitigation Measures

3. MM AQ-3

- Residential parking facility shall include electric vehicle charging station.
- Require use of electric lawn mowers and leaf blowers.