



South Coast
Air Quality Management District

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Redevelopment Agency of the City of Corona
Ms. Laura Huerta
400 South Vicentia Avenue, Suite 310
Corona, CA 92882

Review of the Draft Environmental Impact Report (Draft EIR)
for the Proposed Corona Revitalization Zone Project

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 Environmental Impact Report (final EIR) as appropriate.

The AQMD staff is concerned about the potential health risk impacts to sensitive land uses (e.g., residential, hospital, school and park uses) within 500 feet of the Interstate 15 (I-15) Freeway and 91 Freeway from toxic air pollutants emitted by the significant volume of traffic on these freeways. Therefore, the lead agency should include mitigation in the final EIR that precludes any sensitive land uses within 500 feet of the aforementioned freeways. Further, AQMD staff recommends that pursuant to Section 15126.4 of the California Environmental Quality Act (CEQA) Guidelines additional mitigation measures are considered to minimize the project's significant air quality impacts. Details regarding these comments are attached to this letter.

Pursuant to Public Resources Code Section 21092.5, AQMD staff requests that the lead agency provide the AQMD 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 Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,



Ian MacMillan

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

Attachment

IM:DG

RVC110215-06
Control Number

Potential Health Risk Impacts to Sensitive Land Uses

1. Based on the lead agency's discussion for Impact AQ-4 (Page 4.2-19) in the draft EIR the proposed project includes sensitive land uses (i.e., residential) within 500 feet of the I-15 Freeway and the 91 Freeway. As a result, the AQMD staff is concerned about the potential health risk impacts from toxic air pollutants emitted by the significant volume of traffic on these Freeways.

The lead agency relies on the use of particulate filters placed in residential HVAC systems to mitigate the project's health risk impacts from sources such as freeways below the significance level. While these filters can be effective against particulate pollution they do not have the ability to remove a wide variety of gaseous pollutants (i.e., NOx, TAC's and VOC's) associated with traffic-related pollution and some industrial sources. These filters also have no effectiveness on outdoor activities associated with residential uses and require long term maintenance. Therefore, AQMD staff recommends that the lead agency maintain the buffers specified by CARB for any new project built within this buffer¹.

Mitigation Measures for Construction Air Quality Impacts

2. Given that the lead agency concluded that the proposed project will have significant Construction related air quality impacts the AQMD staff recommends that the lead agency provide additional mitigation pursuant to CEQA Guidelines §151236.4. Specifically, AQMD staff recommends that the lead agency minimize or eliminate significant adverse air quality impacts by adding the mitigation measures provided below.
 - 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,
 - Reroute construction trucks away from congested streets or sensitive receptor areas,
 - Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation,
 - Improve traffic flow by signal synchronization, and ensure that all vehicles and equipment will be properly tuned and maintained according to manufacturers' specifications,
 - Use coatings and solvents with a VOC content lower than that required under AQMD Rule 1113,
 - Construct or build with materials that do not require painting,
 - Require the use of pre-painted construction materials,

¹ California Air Resources Board. April 2005. "Air Quality and Land Use Handbook: A Community Health Perspective." Accessed at:<http://www.arb.ca.gov/ch/landuse.htm>

- Require the use of 2010 and newer diesel haul trucks, such as 2010 model year trucks that have emission controls for both NOX and diesel PM (e.g., material delivery trucks and soil import/export),
- During project construction, all internal combustion engines/construction equipment operating on the project site shall meet EPA-Certified Tier 2 emissions standards, or higher according to the following:
 - ✓ Project Start, to December 31, 2011: All offroad diesel-powered construction equipment greater than 50 hp shall meet Tier 2 offroad 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 offroad diesel-powered construction equipment greater than 50 hp shall meet Tier 3 offroad 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 offroad 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 SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.
 - ✓ Encourage construction contractors to apply for AQMD "SOON" funds. Incentives could be provided for those construction contractors who apply for AQMD "SOON" funds. The "SOON" program provides funds to accelerate clean up of off-road diesel vehicles, such as heavy duty construction equipment. More information on this program can be found at the following website: <http://www.aqmd.gov/tao/Implementation/SOONProgram.htm>

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 Measures for Operational Air Quality Impacts

3. The lead agency's operational air quality analysis demonstrates significant air quality impacts from all criteria pollutant emissions including NO_x, SO_x, CO, VOC, PM₁₀ and PM_{2.5} emissions. These impacts are primarily from mobile source emissions related to vehicle trips associated with the proposed project. However, the lead agency fails to adequately address this large source of emissions. Specifically, the lead agency does not require any mitigation measures in the draft EIR and only states that the individual projects will be subject to a list of nominal goals and policies in the city's general plan that pertain to air quality. Therefore, the lead agency should reduce the project's significant air quality impacts by reviewing and incorporating transportation mitigation measures from the greenhouse gas quantification report² published by the California Air Pollution Control Officer's Association in the final EIR.

² California Air Pollution Control Officer's Association. August 2010. Quantifying Greenhouse Gas Mitigation Measures. Accessed at: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>