



South Coast  
Air Quality Management District  
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(909) 396-2000 • [www.aqmd.gov](http://www.aqmd.gov)

E-MAILED: FEBRUARY 10, 2011

February 10, 2011

Mr. Scott Lee, Principal Planner, [slee@cityofalhambra.org](mailto:slee@cityofalhambra.org)  
Development Services Department  
City of Alhambra  
111 S. First Street  
Alhambra, CA 91801

**Draft Environmental Impact Report (Draft EIR) for the Proposed California PEO  
Home Senior Housing Project (SCH No. 2009021010)**

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 the demolition of a 1.8 million cubic foot senior housing and continuing care facility (10,000 cubic feet to be demolished daily) and construction of a new, larger facility totaling approximately 414,000 square feet on an approximate 4.11-acre site. The project would be constructed in two phases and take about 25 months to complete. The site is surrounded by residential uses and an elementary school.

The AQMD staff is concerned that all feasible mitigation measures have not been incorporated to reduce the significant emissions associated with the project construction activities. In addition to the mitigation measures listed by the lead agency starting on page 4.2-9, AQMD staff recommends that additional mitigation measures be considered as 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. Scott Lee,  
Principal Planner

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February 10, 2011

Sincerely,

A handwritten signature in black ink that reads "Ian V. MacMillan". The signature is written in a cursive style with a large, prominent initial "I".

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

IM:GM

LAC101214-02  
Control Number

### Construction Mitigation Measures

- ❖ Because the lead agency has determined that construction phase emissions for particulate matter (PM10 and PM2.5) exceed the established significance thresholds, the SCAQMD recommends the following modifications and additions to the mitigation measures listed on page 4.2-9, if applicable and feasible. Additional construction mitigation measure suggestions can also be found at [http://www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html):

#### Recommended Change:

- AQ-1(c)      During clearing, grading, earth moving, excavation, transportation of cut or fill materials, demolition debris, streets and sidewalks within 150 feet of the site perimeter shall be swept and cleaned ~~at the end of each work day as a minimum twice weekly~~ (recommend water sweepers with reclaimed water) if visible soil material has been carried onto adjacent public paved roads.

#### Recommended additions:

- Prohibit all vehicles from idling in excess of five minutes, both on-site and off-site;
- 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;
- 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;
- Reroute construction trucks away from congested streets or sensitive receptor areas;
- Require all on-site construction equipment to meet EPA Tier 2 or higher emissions standards according to the following schedule adopted by other lead agencies in the South Coast Air Basin:
  - 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 and other construction related emissions, the following mitigation measure tables are located at the following website:

[www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html).

- Install wheel washers where vehicles enter and exit the construction site onto paved roads or wash off trucks or any equipment leaving the site each trip;
- Replace ground cover in disturbed areas as quickly as possible;
- Apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more); and
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation.