



South Coast Air Quality Management District

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SENT VIA USPS AND E-MAIL:

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July 17, 2014

Ms. Betty Donovanik, Senior Planner
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City of Pasadena
175 N. Garfield Avenue
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Draft Environmental Impact Report (Draft EIR) for the Proposed 100 W. Walnut Planned Development (SCH NO. 2013071018)

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 construct a mixed-use development that would add to the existing single-use 12-story office complex currently occupying the 22.67-acre project site. Three of the five proposed project areas will include the following development: Area A would be developed with residential and work/live uses and Area B and C will include commercial uses only. The remaining areas, D and E, will not include any project development. Additional parking is planned with the construction of a multi-level subterranean parking structure that will accommodate approximately 4,104 parking spaces. The proposed project is planned to occur sequentially over two phases with each phase taking approximately 23-months to complete based on market conditions. Project build out for Phase 1 (Development Areas A and B) is planned for 2016 and Phase 2 (Development Area C) for 2020, respectively. The first six-months of the 23-month Phase 1 construction period would include grading and excavation for the subterranean parking structure. Approximately 360 daily truck haul trips are estimated in the CalEEMod land use model including trips to haul approximately 346,296 cubic yards of soil off-site during Phase 1.

Mitigation to Reduce Construction NOx and VOC Emission Impacts

During both construction phases, the lead agency has determined that project regional emissions will exceed the recommended SCAQMD daily thresholds of significance for NOx and VOC, mostly from on- and off-road equipment and architectural coating activities. Therefore, the SCAQMD staff recommends the following measures be incorporated into the Final EIR pursuant to Section 15126.4 of the CEQA Guidelines in

addition to the mitigation measures included in the Air Quality Section starting on page IV.F-31 to further reduce significant construction NOx and VOC air quality impacts, if feasible:

Construction NOx Mitigation Measures

- 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.
- Consistent with measures that other lead agencies in the region (including Port of Los Angeles, Port of Long Beach, Metro and City of Los Angeles)¹ have enacted, require all on-site construction equipment to meet EPA Tier 3 or higher emissions standards according to the following:
 - ✓ Project start, 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.
 - ✓ Encourage construction contractors to apply for SCAQMD “SOON” funds. Incentives could be provided for those construction contractors who apply for SCAQMD “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> .
 - ✓ 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.

¹ For example see the Metro Green Construction Policy at:
http://www.metro.net/projects_studies/sustainability/images/Green_Construction_Policy.pdf

Other Construction NOx Measures

- Limit soil disturbance to the daily amounts analyzed in the Draft EIR.
- 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.
- Require the use of electricity from power poles rather than temporary diesel or gasoline power generators.

Additional measures to reduce off-road construction equipment pursuant to Section 15126.4 of the California Environmental Quality Act (CEQA) Guidelines, are available in the mitigation measure tables located at the following website:

<http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies> .

Construction VOC Mitigation Measures

- Construct or build with materials that do not require painting or use pre-painted construction materials.
- Use coatings and solvents with a VOC content lower than that required under SCAQMD Rule 1113.

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 Gordon Mize, Air Quality Specialist CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,



Edward A. Eckerle
Program Supervisor
Planning, Rule Development & Area Sources

Attachment

EE:GM

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