



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:
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Ms. Keri Johnson
Upland City Hall
Development Services Department
460 N. Euclid Ave.,
Upland, CA 91786

Draft Environmental Impact Report (Draft EIR) for the Proposed:
Comprehensive General Plan Update (GPU 08-03)
Comprehensive Zoning Code Update (ZCU 08-03)
Cable Airport Land Use Compatibility Plan (CALUCP) Update
Climate Action Plan (CAP)

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.

The proposed Project is an update to the Comprehensive General Plan, Comprehensive Zoning Code, Cable Airport Land Use Compatibility Plan, and Climate Action Plan (CAP). In the Air Quality Section, the Lead Agency quantified the project's construction and operation air quality impacts and has compared those impacts with the SCAQMD's recommended regional and localized daily significance thresholds. Based on its analyses, the Lead Agency has determined that construction and operational air quality impacts will exceed the recommended regional daily significance threshold for VOC, NO_x, CO, PM₁₀ and PM_{2.5}. Both construction and operational air quality impacts are significant and unavoidable. In an attempt to mitigate air quality impacts, the Lead Agency has proposed mitigation measures AQ-1 through AQ-14. SCAQMD Staff comments on the mitigation measures are included in the Attachment.

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. The SCAQMD staff is available to work with the Lead Agency to address these issues and any other air quality questions that may arise. Please contact Jack Cheng, Air Quality Specialist CEQA Section, 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
SBC150310-09

Mitigation Measures for Construction Air Quality Impacts

1. Based on a review of the Draft EIR the Lead Agency determined that the proposed project will result in significant air quality impacts during construction. Therefore, the SCAQMD staff recommends the following changes and additional measures be incorporated into the proposed project and Final EIR to reduce significant project impacts in addition to the measures included in the Draft EIR.

Recommended Changes:

AQ-1

- All active portions of the site shall be watered twice daily and as needed to prevent excessive amounts of dust;
- ~~Visible dust beyond the property line which emanates from the project shall be prevented to the maximum extent feasible.~~ Visible dust shall not cross the property line.

AQ-3

- Contractors shall use ~~high-pressure low-volume (HPLV)~~ high-volume-low- pressure (HVLP) paint applicators with a minimum transfer efficiency of at least ~~50~~ 65 percent;

AQ-13

- New sensitive land uses such as residential, schools, hospitals, medical offices, day care facilities, and fire stations to be located within the City shall not be located closer than 500 feet to the I-10 or SR-210 freeways [...] if new sensitive land uses cannot meet this setback, they shall be designed and conditioned to include mechanical ventilation systems with fresh air filtration. For operable windows or other sources of ambient air filtration, installation of central heating, ventilation, and air conditioning (HVAC) system that includes high efficiency filters for particulates (Minimum Efficiency Reporting Value [MERV] 13 or higher) or other similarly effective systems shall be required.

AQ-14

- New sensitive land uses such as residential, schools, hospitals, medical offices, day care facilities, and fire stations shall not be located closer than 1,000 feet from any existing or proposed distribution center/warehouse facility which generates a minimum of 100 truck trips per day [...] If new sensitive land uses cannot meet this setback, they shall be designed and conditioned to include mechanical ventilation systems with fresh air filtration. For operable windows or other sources of ambient air filtration, installation of a central heating, ventilation, and air conditioning (HVAC) system that includes high efficiency filters for particulates (Minimum Efficiency Reporting Value [MERV] 13 or higher) or other similarly effective systems shall be required.

Limits to Enhanced Filtration Units

The lead agency should consider the limitations of the proposed mitigation in AQ-13 and AQ-14 (enhanced filtration) on housing residents. For example, in a study that SCAQMD conducted to investigate filters¹ similar to those proposed costs were expected to range from \$120 to \$240 per year to replace each filter. In addition, because the filters would not have any effectiveness unless the HVAC system is running, there may be increased energy costs to the resident. The

¹ This study evaluated filters rated MERV 13+ while the proposed mitigation calls for less effective MERV 6 or better filters. Accessed at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf?sfvrsn=0> .

proposed mitigation assumes that the filters operate 100 percent of the time while residents are indoors. These filters also have no ability to filter out any toxic gases from vehicle exhaust. The presumed effectiveness and feasibility of this mitigation should therefore be evaluated in more detail prior to assuming that it will sufficiently alleviate near roadway exposures.

Additional Mitigation Measures for Air Quality Impacts

2. 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)² have enacted, require all on-site construction equipment to meet EPA Tier 4 or higher emissions standards according to the following:
 - 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.
 - 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.
 - 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 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/home/programs/business/business-detail?title=vehicle-engine-upgrades>

For additional measures to reduce off-road construction equipment, refer to 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>.

² For example see the Metro Green Construction Policy at:

http://www.metro.net/projects_studies/sustainability/images/Green_Construction_Policy.pdf