



South Coast Air Quality Management District

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Draft Program Environmental Impact Report (Draft PEIR) for the Proposed Azusa Transit Oriented Development (TOD)

The South Coast Air Quality Management District (SCAQMD) staff 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 PEIR. In the project description, the lead agency proposes to redevelop and repurpose approximately 308 acres over 20 years. The specific plan identified development potential of 403,000 sf of retail, services, hotels, and residential units.

In the Air Quality Section, the lead agency quantified the project's construction 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 construction air quality impacts will be less than significant. SCAQMD staff has concerns regarding the methodology of the air quality analysis. The lead agency analyzed all expected land uses and averaged the emissions over 20 years. This methodology underestimates the potential maximum daily emissions. The lead agency should use a worst-case build scenario to determine the maximum daily emission rate. Furthermore, the analysis uses a year 2020 emission factor for estimating construction equipment emissions which underestimates air quality emissions. Instead, the lead agency should use 2015 emission factors that would conservatively estimate construction emissions. SCAQMD staff recommends the lead agency re-analyze the air quality analysis using the worst-case build scenario and 2015 construction equipment emission factors.

The project's daily operational air quality impacts also exceed the regional significance thresholds. The lead agency concludes that emissions are significant and unavoidable even with mitigation measures. SCAQMD staff recommends that the lead agency include additional mitigation, to further minimize these impacts in accordance with the attached mitigation measures.

The SCAQMD staff is available to work with the Lead Agency to address these concerns and any other air quality questions that may arise. Please contact Jack Cheng, Air Quality Specialist at (909) 396-2448, if you have any questions regarding these comments. We look forward to reviewing the Final EIR associated with this project.

Sincerely,

Barbara Radlein

Barbara Radlein
Program Supervisor
Planning, Rule Development & Area Sources

BR:JC
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Attachment

Recommended Mitigation Measures

Based on the air quality analysis in the Draft EIR, the lead agency determined that the proposed project will result in significant regional air quality impacts during construction and operation. Therefore, SCAQMD staff recommends that, pursuant to Section 15126.4 of the CEQA Guidelines, the following measures be included in the Final EIR, in addition to the measures proposed by the lead agency, in order to minimize or eliminate significant adverse air quality impacts during construction and operation

Construction 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 South Coast Air Basin (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 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.
 - 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=off-road-diesel-engines>.

- Require the use of electricity from power poles rather than temporary diesel or gasoline power generators.
- Provide temporary traffic controls such as a flag person, during all phases of significant construction activity 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.
- Limit soil disturbance to the amounts analyzed in the Final EIR.
- All materials transported off-site shall securely covered.
- Apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more).
- Water active sites at least twice daily;

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

- Apply water three times daily, or non-toxic soil stabilizers according to manufacturers' specifications, to all unpaved parking or staging areas or unpaved road surfaces;
- Reduce traffic speeds on all unpaved roads to 15 mph or less.
- Construct or build with materials that do not require painting.
- Require the use of pre-painted construction materials.

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>.

Operational Mitigation Measures

- Improve walkability design and pedestrian network.
- Increase transit accessibility and frequency by incorporating Bus Rapid Transit lines with permanent operational funding stream.
- Limit parking supply and unbundle parking costs. Lower parking supply below ITE rates and separate parking costs from property costs.

Mobile Source Emissions - Electric Vehicle (EV) Charging Stations

Based on the air quality analysis in the Draft PEIR, the lead agency determined that the proposed project will result in significant unavoidable regional air quality impacts during operation. Specifically, the air quality analysis demonstrated that the proposed project will exceed the SCAQMD's CEQA regional operational significance thresholds for ROG and NOx. Vehicles that can operate at least partially on electricity have the ability to substantially reduce the significant NOx impacts from this project. It is important to make this electrical infrastructure available when the project is built so that it is ready when this technology becomes commercially available. The cost of installing electrical charging equipment onsite is significantly cheaper if completed when the project is built compared to retrofitting an existing building.

Therefore, SCAQMD staff recommends that, pursuant to Section 15126.4 of the CEQA Guidelines, the following measure be included in the Final EIR, in addition to the measures proposed by the Lead Agency, in order to minimize or eliminate significant adverse air quality impacts:

- Construct with the appropriate infrastructure to facilitate sufficient electric charging for vehicles to plug-in.
- Require at least 5% of all vehicle parking spaces include EV charging stations. At a minimum, electrical panels should be appropriately sized to allow for future expanded use.