



**South Coast
Air Quality Management District**
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**Draft Environmental Impact Report (EIR) for the
Armstrong Ranch Specific Plan**

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 EIR.

In the project description, the Lead Agency proposes to develop a 199-acre master-planned community consisting of residential and recreational areas. Approximately 994 residential units are proposed to be constructed over seven planning areas over a five year period. In the Air Quality Section, the Lead Agency quantified the Project's construction and operation 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 operational emissions of the Project would exceed regional and localized ROG, NOx, and PM2.5 thresholds. Even with the proposed mitigation measures, the regional and localized impacts from operational emissions associated with the Project would be significant and unavoidable. The SCAQMD staff recommends that the proposed Project include all feasible mitigation measures in the Final EIR to further reduce the projected significant operational impacts. Details 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. Further, staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Jack Cheng, Air Quality Specialist, at (909) 396-2448, if you have any questions regarding the enclosed comments.

Sincerely

Jillian Wong

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Planning, Rule Development & Area Sources

JW:JC
SBC161004-06
Control Number

Construction Mitigation Measures (NO_x)

1. 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. Specifically, the air quality analysis demonstrated that the proposed Project will exceed the SCAQMD's CEQA regional construction significance thresholds for NO_x. Therefore, SCAQMD staff recommends that, pursuant to Section 15126.4 of the CEQA Guidelines, the following changes and additional 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:

Recommended Changes:

Mitigation Measure AQ-1-SP All heavy ~~grading~~ duty equipment with engines with a rating of ~~150~~ 50 horsepower or greater shall be compliant with CARB/EPA Tier IV Final emissions standards.

2. 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>.
3. 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 NO_x emissions requirements.
4. Require the use of electricity from power poles rather than temporary diesel or gasoline power generators.
5. Provide temporary traffic controls such as a flag person, during all phases of significant construction activity to maintain smooth traffic flow.
6. Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site.
7. Reroute construction trucks away from congested streets or sensitive receptor areas.
8. Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM₁₀ generation.
9. Improve traffic flow by signal synchronization.

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

Construction Mitigation Measures (PM10 and PM2.5)

10. Based on the estimated significant regional and localized construction impacts, the SCAQMD staff recommends the following additional measures to further reduce those impacts:

Since the Project is considered a large operation (50 acre sites or more of disturbed surface area; or daily earth-moving operations of 3,850 cubic yards or more on three days in any year) in the South Coast Air Basin, the Lead Agency is required to comply with all SCAQMD Rule 403(e) – Additional Requirements for Large Operations. This may include but not limited to Large Operation Notification, appropriate signage, additional dust control measures, and employment of a dust control supervisor that has successfully completed the Dust Control in the South Coast Air Basin training class. Therefore, the Final EIR should contain a detailed description of how the Project will comply with [Rule 403\(e\)](#). Please contact dustcontrol@aqmd.gov for more information.

- Additional requirements include but are not limited to:
 - Implementation of Table 2 of Rule 403 at all times and implementation of the actions specified in Table 3 of Rule 403 when applicable.
 - Submittal of a fully executed Large Operation Notification to the Executive Officer.
 - Maintenance of daily records to document the specific dust control actions taken.
 - Installation and maintenance of project signage with project contact person that meets the minimum standards of Rule 403 Implementation Handbook.
 - Identification of a dust control supervisor that has completed the AQMD Fugitive Dust Control Class.
11. Limit soil disturbance to the amounts analyzed in the Final EIR.
12. All materials transported off-site shall securely covered.
13. Apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more).
14. 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;
15. Traffic speeds on all unpaved roads to be reduced to 15 mph or less.
16. Construct or build with materials that do not require painting.

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>.

Mobile Source Emissions – Additional Operational Mitigation Measures

17. Improve walkability design and pedestrian network.
18. Increase transit accessibility and frequency by incorporating Bus Rapid Transit lines with permanent operational funding stream.

Electric Vehicle (EV) Charging Stations

19. Vehicles that can operate at least partially on electricity have the ability to substantially reduce the significant NO_x 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, the SCAQMD staff recommends the lead agency require the proposed project to be constructed with the appropriate infrastructure to facilitate sufficient electric charging for vehicles to plug-in. The SCAQMD staff recommends that the lead agency require at least 5% of all vehicle parking spaces include EV charging stations. At a minimum, electrical panels should appropriately sized to allow for future expanded use.