



South Coast Air Quality Management District

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Mitigated Negative Declaration (MND) for the Proposed Big Canyon Coastal Habitat Restoration and Adaption Project

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 CEQA Document.

SCAQMD Staff's Summary of Project Description

The lead agency proposes the restoration of the Big Canyon Coastal Habitat through removal of non-native plants, replanting of native plants, enhancing public access, and stabilizing the creek and floodplain with erosion control measures, on 11.3 acres (proposed project).¹ The proposed project is located at 1900 Back Bay Drive, south of the State Route 55 and State Route 73 (SR-73) interchange.

SCAQMD Staff's Summary of Air Quality Analysis

In the air quality analysis, the lead agency quantified emissions resulting from construction and operation of the proposed project and compared those emissions to SCAQMD's air quality CEQA significance thresholds. Upon review of the air quality analysis, SCAQMD staff found multiple inconsistencies between the MND and the CalEEMod output file. For example, the lead agency quantified emission reductions resulting from mitigation measures input into CalEEMod² but SCAQMD staff found that no mitigation measures or project design features were identified in the MND. Detailed comments are provided below.

General Comments

Based on the CalEEMod output file, the lead agency relied on mitigation measures to reduce the proposed project's NOx emissions during construction from 169 pounds per day to 63 pounds per day. However, in the MND, the lead agency only reports the proposed project's mitigated construction emissions value of 63 pounds per day³ of NOx and does not include the mitigation measures that are identified in the CalEEMod output file that reduce the proposed project's construction emissions to this less than significant level. Therefore, SCAQMD staff recommends the lead agency revise the air quality analysis to include both unmitigated and mitigated emissions resulting from the proposed project.

Additionally, the lead agency states in the MND that the construction phase of the proposed project will occur over a five month period, however, based on the CalEEMod output file⁴ the construction period is nine months. Therefore, SCAQMD staff recommends the lead agency clarify which construction schedule is more accurate and incorporate this clarification in the final CEQA document.

¹ MND. Page 1.

² MND. Appendix B, *Air Quality Modeling*, CalEEMod Output, Winter Run, 1.3 User Entered Comments & Non-Default Data, Page 1 of 49.

³ MND. Table 7, Page 60

⁴ MND. Appendix B, *Air Quality Modeling*, CalEEMod Output, Winter Run, 3.0 Construction Detail, Page 13 of 49.

Recommended Mitigation Measures

The lead agency included Tier 4 off road-construction equipment in the CalEEMod file but did not include it in the MND. Therefore, SCAQMD staff recommends the lead agency incorporate AQ-1(a) to ensure tier 4 standards are met, and AQ-2(b) to further reduce emissions resulting from on-road trucks during all construction phases of the proposed project in the MND. Details regarding these recommended mitigation measures are provided below.

AQ-1 Construction equipment maintenance records (including the emission control tier and/or the engine emission standard of each equipment) shall be kept on site during construction and shall be available for inspection by the lead agency.

- a) Off-road diesel-powered construction equipment greater than 50 horsepower shall meet United States Environmental Protection Agency Tier 4 off-road emissions standards. A copy of each unit's certified tier specification shall be available for inspection by the lead agency at the time of mobilization of each applicable unit of equipment.

- b) All on-road diesel haul trucks used during the construction phase shall meet or exceed 2010 engine emission standards specified in California Code of Regulations Title 13, Article 4.5, Chapter 1, Section 2025 or be powered by natural gas, electricity, or other diesel alternative. Operators shall maintain records of all trucks associated with project construction to document that each truck used meets these emission standards.

Permits and Compliance with SCAQMD Rules

In the event that the proposed project requires a permit from the SCAQMD, the SCAQMD should be identified as a responsible agency for the proposed project. For more information on permits, please visit SCAQMD webpage at: <http://www.aqmd.gov/home/permits>. Questions on permits can be directed to SCAQMD's Engineering and Permitting staff at (909) 396-3385.

Conclusion

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the final CEQA Document. The SCAQMD staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Robert Dalbeck, Assistant Air Quality Specialist - CEQA IGR Section, at (909) 396-2139, if you have any questions regarding these comments.

Sincerely,

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