



South Coast Air Quality Management District

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FAXED: December 17, 2009

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Ms. Janet Johnson Brown
City of Newport Beach
Planning Department
3300 Newport Boulevard
P.O. Box 1768
Newport Beach, CA 92658-8915

Review of the Draft Environmental Impact Report (Draft EIR) for the Proposed Sunset Ridge Park Project

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 either a Revised Draft or Final Environmental Impact Report (Final EIR) as appropriate.

The SCAQMD staff appreciates the fact that the lead agency allowed additional time in which to submit comments. Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD staff with written responses to all comments contained herein prior to the adoption of the Final EIR. The SCAQMD staff has provided detailed comments in the following attachment and is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,

A handwritten signature in black ink that reads "Susan Nakamura".

Susan Nakamura
Planning and Rules Manager
Planning, Rule Development & Area Sources

Attachment

EE: DG

ORC091029-01
Control Number

Ms. Janet Johnson Brown

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Air Quality Analysis and Mitigation Measures:

1. In Section 4.4-7 (Environmental Impacts) on page 4.4-31 of the Draft EIR the lead agency justifies its analysis of only five acres of disturbance to evaluate localized air quality impacts during the construction phase of the project; however, the lead agency does not include any provisions or requirements to limit the project's construction activity to only five acres per day. Therefore, SCAQMD staff requests that the lead agency require a mitigation measure that limits the project's construction activity to five acres or less per day.
2. Given that the lead agency's regional construction air quality analysis demonstrates that the criteria pollutant emissions exceed the SCAQMD's daily significance thresholds for NOX, the SCAQMD recommends that the lead agency consider adding the following mitigation measures to further reduce air quality impacts from the construction phase of the project, if feasible:

NOx

- Prohibit all diesel trucks from idling in excess of five minutes, both on-site and off-site,
- Use alternative fueled off-road equipment,
- Ensure that all streets are swept at least once a day using SCAQMD Rule 1186 certified street sweepers or roadway washing trucks if visible soil materials are carried to adjacent streets (recommend water sweepers with reclaimed water),
- Require construction equipment that meet or exceed Tier 3 standards and equip construction equipment with oxidation catalysts, particulate traps and demonstrate that these verified/certified technologies are available,
- Use electricity from power poles rather than temporary diesel or gasoline power generators,
- Configure construction parking to minimize traffic interference,
- 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,
- Schedule construction activities that affect traffic flow on the arterial system to off-peak hour to the extent practicable,
- Reroute construction trucks away from congested streets or sensitive receptor areas,
- Improve traffic flow by signal synchronization, and
- Ensure that all vehicles and equipment will be properly tuned and maintained according to manufacturers' specifications.