



# South Coast Air Quality Management District

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## **Review of the Draft Environmental Impact Report (Draft EIR) for the Proposed Cielo Vista 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 environmental impact report (Final EIR) as appropriate.

### **Health Risk Impacts and Odor Impacts from Future Oil Drilling Operations**

The SCAQMD staff is concerned about the project's proposed mix of sensitive land uses<sup>1</sup> and industrial land uses. Specifically, as depicted by Figure 2-4 and Figure 2-5 of the Draft EIR the proposed project will place single family residential units adjacent to a future potentially active oil drilling operation. As a result, the SCAQMD staff is concerned about potential health risk impacts and odor impacts to nearby residents from oil drilling operations that could occur at the project site. Based on past land use decisions in the region that have placed oil drilling operations next to residential land uses both health risk impacts and odor impacts have proved to be critical public concerns. Therefore, the SCAQMD staff recommends that the Lead Agency conduct a Health Risk Assessment (HRA) to determine the potential health risk impacts to surrounding residents (i.e., existing and future on-site residents) and an odor impact analysis to determine potential odor impacts from potential oil drilling activity that may occur at the project site prior to approving the proposed land use designations for this project.

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<sup>1</sup> California Air Resources Board. April 2005. "Air Quality and Land Use Handbook: A Community Health Perspective." Accessed at: <http://www.arb.ca.gov/ch/landuse.htm>

### Construction Emissions Analysis

Based on the project description (see page 2-14 of the Draft EIR) the project requires 660,000 cubic yards of cut and fill during construction, however, it does not appear that the Draft EIR accounted for the potential air quality impacts resulting from this significant amount of activity. Specifically, it appears that the Draft EIR relies on the default construction values in CalEEMod for the project's grading phase including the equipment fleet mix, number of equipment pieces and hours of operation. However, the default CalEEMod values are based on grading activity that occurred primarily on flat terrain and not on sloped terrain that required a significant volume of cut and fill. Therefore, the SCAQMD staff recommends that the Lead Agency revise the air quality analysis to ensure that the air quality analysis accounts for the substantial cut and fill activity necessary to construct the proposed project.

### Minimize Potential Localized Air Quality Impacts

Based on Chapter 3.0 (Basis for Cumulative Analysis) of the Draft EIR construction of the proposed project may occur simultaneously with the construction of the Esperanza Hills Project that is adjacent to the project site. Given that both projects require substantial grading activity that could result in up to 946,700 cubic yards of cut and fill (i.e., combined) the SCAQMD staff recommends that the lead agency coordinate the construction phases of both projects to minimize any potential localized air quality impacts to residents surrounding the project sites.

### Mitigation Measures

In the event that the Lead Agency determines the project will have significant health risk impacts or air quality impacts the SCAQMD staff recommends that the Lead Agency provide additional mitigation measures to minimize such impacts pursuant to Section 15126.4 of the California Environmental Quality Act (CEQA) Guidelines. A list of potential construction-related air quality mitigation measures is available at:

[http://www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html)

### SCAQMD Contact Information

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 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 "Ian V. MacMillan". The signature is written in a cursive style with a large initial "I" and "M".

Ian MacMillan

Program Supervisor, CEQA Inter-Governmental Review  
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