November 13, 2026

Virginia Gomez
Senior Planner
Orange County Public Works
601 North Ross Street
Santa Ana, California 92701
virginia.gomez@pw.oc.gov

Sent via email

Dear Virginia Gomez:

Thank you for providing the California Air Resources Board (CARB) with the opportunity to comment on the Draft Mitigated Negative Declaration (MND) for the Grand Avenue Fleet Services Facility Project (Project), State Clearinghouse No. 2026080888. The Project is located in the City of Santa Ana (City). As the Orange County Department of Public Works is sponsoring the Project, the County of Orange (County) is the lead agency for the Project under the California Environmental Quality Act (CEQA).

The Project proposes to consolidate OC Public Works' existing facilities at a County-owned site adjacent to the County Operations Center to streamline operations, reduce redundancy, and improve service delivery. The proposed development would include a 45,706-square-foot fleet services building; a 20,000-square-foot facility operations building; a 10,000-square-foot solar canopy; and a disposal lot. The proposed facility would support the maintenance and repair of more than 3,000 County-owned vehicles and pieces of equipment and provide centralized fleet parking, storage, and vehicle pickup and return. As a project design feature, the Project Applicant would install a minimum 12-foot-high, approximately 1,200-foot-long concrete masonry unit wall along the south side of John F. Kennedy Elementary School. According to the MND, Project operations are expected to generate approximately 150 daily vehicle trips, with diesel-powered vehicles accounting for less than 5% of the fleet, equivalent to an estimated 7.5 daily diesel-vehicle trips.[1]

To minimize the Project's potential impacts on public health at John F. Kennedy Elementary School and nearby residences, the County should strive to ensure that the Project should emit the least amount of air pollution as possible. The following sections present CARB's comments on specific aspects of the MND. In summary, CARB urges the County to take the following actions: (1) fully evaluate the Project's potential health risk impacts based on substantial evidence; (2) require the use of the cleanest available construction equipment

[1] County of Orange Public Works. Grand Avenue Fleet Services Facility Project Mitigated Negative Declaration. Page 38. Accessible at: *https://ceqanet.lci.ca.gov/2026080888/Attachment/GD5WKN*

with a recommendation to participation in CARB's California Clean Construction Program (CCC) during Project construction.

The Project Would Impact Nearby Schools and Residences

CARB is concerned that the Project would increase exposure to criteria and toxic air pollutants for the existing residence and schools. Figure 1 shows the location of the Project site in relation to nearby schools and communities. As shown in Figure 1, the Project site is near residential homes, John F. Kennedy Elementary School, Madison Elementary School, and Century High School. Vehicles and trucks serving the Project would transit near these sensitive uses. There are other single- and multi-family residences, schools, and urgent care clinics located further from the Project site. Of particular concern, the entrance to the proposed facility is directly next to the John F. Kennedy Elementary School's playgrounds. This proximity raises concerns regarding the potential exposure of students and school staff to air pollutant emissions associated with Project construction and operation. Construction activities and the operation of a facility that would maintain and repair more than 3,000 County-owned vehicles and pieces of equipment could expose residents and students learning and playing at nearby schools to diesel particulate matter (diesel PM) and other air pollutants that could pose a significant health impact.

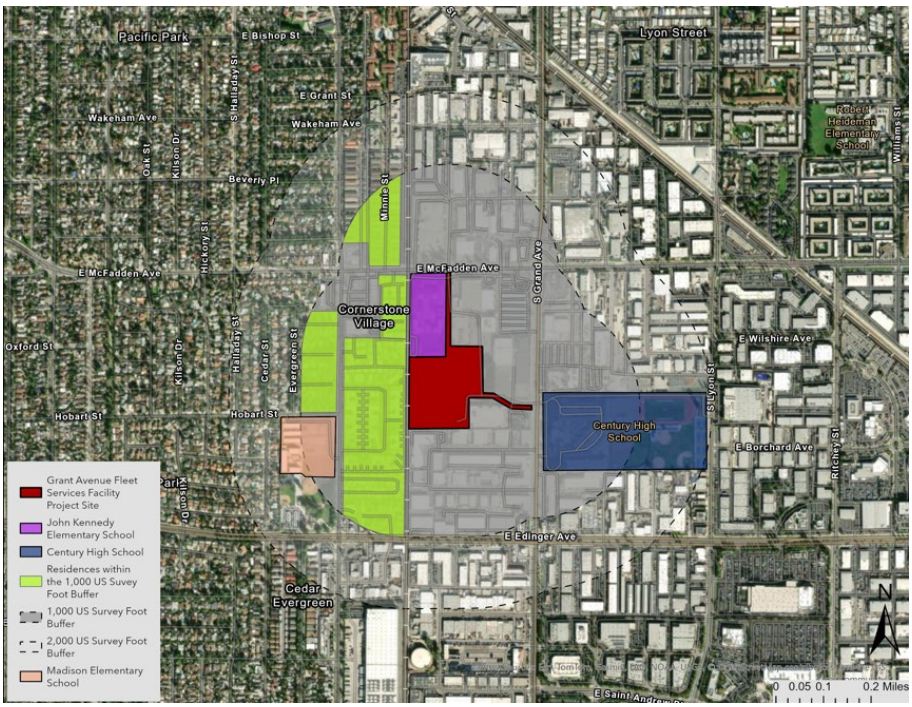


Figure 1. Proximity of the Project to Schools and Residences.

These concerns are particularly important given the existing environmental burdens in the Project vicinity. Figure 2 shows the combined boundaries of census tracts in the Santa Ana area that are considered environmental justice communities.[2] These census tracts score within the highest 25% of the census tracts statewide under CalEnviroScreen 5.0 and are therefore designated as disadvantaged communities, indicating that the surrounding community already experiences a combination of pollution burdens and socioeconomic vulnerabilities. [3]

As shown in Figure 2, the Project site is located in a census tract with a pollution burden reaching 94th percentile, placing this community within the top 6% of census tracts in California for pollution burden. CalEnviroScreen evaluates multiple pollution indicators and population characteristics to identify communities that may be disproportionately burdened by environmental pollution. Existing environmental burdens underscore the importance of carefully evaluating the Project's potential effects on nearby sensitive receptors and avoiding additional, preventable exposures, particularly for children who use the school's outdoor play areas and residents living immediately adjacent to the Project site.

Given the Project's proximity to a school and residential uses and the existing environmental burdens in the surrounding community, CARB urges the County to ensure that the MND fully evaluates the potential effects of Project-related emissions on nearby sensitive receptors and adequately considers the environmental conditions affecting the surrounding community. The County should ensure that its analysis is supported by substantial evidence and that the Project's potential impacts on students, school staff, and nearby residents are thoroughly addressed.

---

[2] City of Santa Ana. Environmental Justice in the General Plan. Accessible at *https://general-plan-santa-ana-ca.proudcity.com/documents/map-of-ej-communities/*

[3] OEHHA. CalEnviroScreen 5.0. Accessible at *https://experience.arcgis.com/experience/be03d78c74454429ab1d3fd9266d4400*

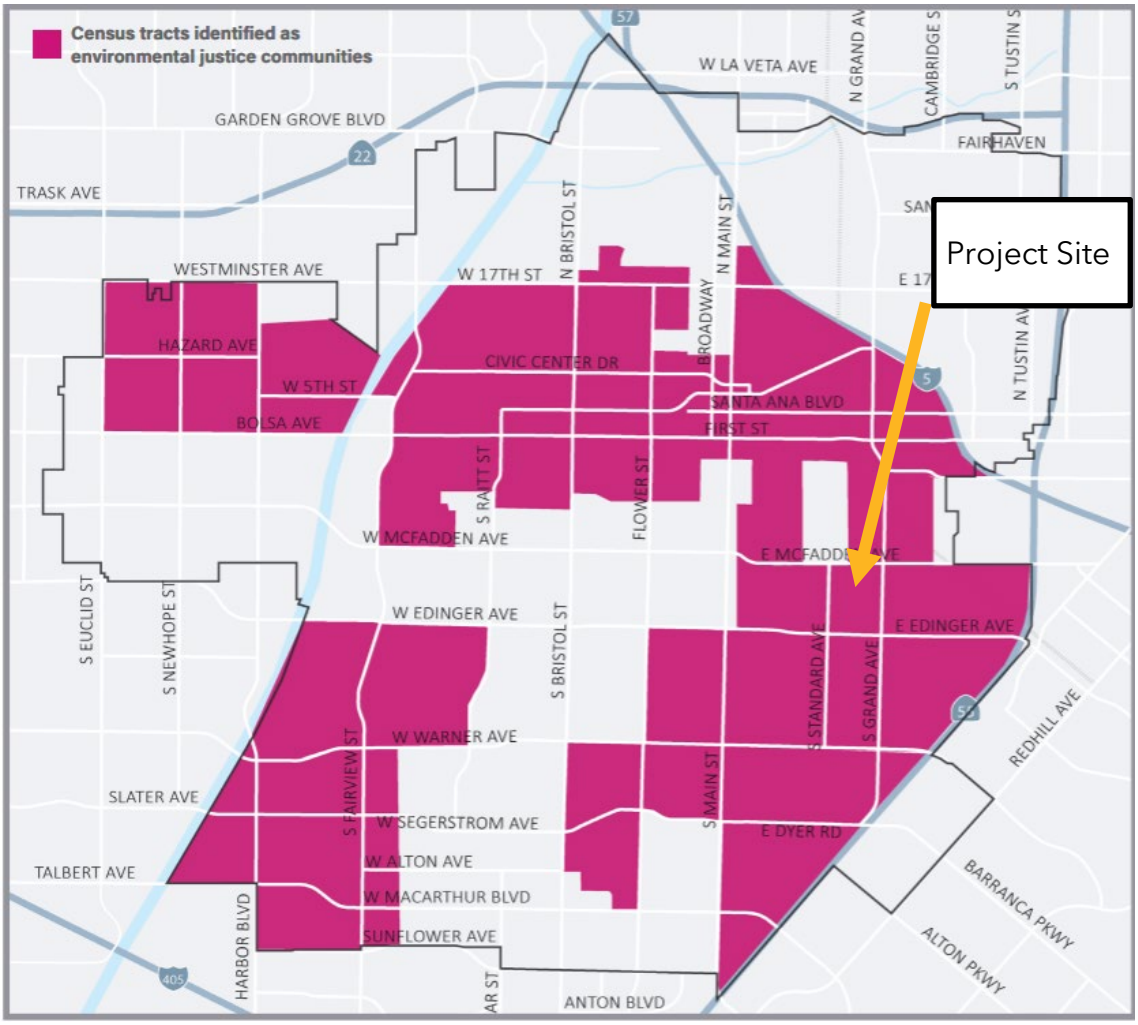


Figure 2: Environmental Justice Communities near the Project site.

The County Must Fully Evaluate the Project's Potential Cancer Risk Impacts

CARB is concerned that the County may not have adequately evaluated the Project's potential cancer risks to students at John F. Kennedy Elementary School and residents in the surrounding community. As shown in Figure 1, the existing elementary school is located directly west of the entrance to the proposed Project and may be exposed to diesel PM emissions generated during Project construction and operation. Despite the school's immediate proximity to the Project site, the County did not prepare a health risk assessment (HRA) to evaluate the Project's potential health risk impacts on students attending the school or nearby residents.

Construction of the Project would generate short-term diesel PM emissions from both on-road and off-road diesel equipment. The MND justifies its decision not to prepare a construction HRA on the basis that construction would occur over a relatively short period and that existing California emissions regulations, including the In-Use Off-Road Diesel-Fueled Fleets Regulation, would limit on-site truck idling to 5 minutes and require the use of higher tier off-road equipment. However, the County should not rely solely on compliance with existing air quality regulations to justify foregoing an evaluation of the Project's potential health risk impacts. Furthermore, according to the MND, Project construction is anticipated to last approximately 18 months. The latest Office of Environmental Health Hazard Assessment's (OEHHA) guidance (2015 Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments) recommends evaluating cancer risks associated with construction projects lasting longer than 2 months.[4]

Given that construction would extend well beyond this recommended two-month screening threshold and that the Project site shares a boundary with John F. Kennedy Elementary School and is located near residences, the County should prepare a construction HRA to evaluate the Project's potential cancer risks to nearby sensitive receptors. The construction HRA should account for all diesel PM emission sources associated with Project construction, including, but not limited to, off-road construction equipment, diesel generators, and on-road heavy-duty trucks. The assessment should also be conducted in accordance with the latest applicable OEHHA guidance to ensure that potential cancer risks to students and nearby residents are adequately evaluated.

The County must also provide substantial evidence in the Final MND to support its assumption that only 5% of the vehicle trips serving the Project would be diesel-powered. Specifically, the MND estimates that, of the approximately 150 daily vehicle trips generated by the Project, only 7.5 trips would involve diesel-powered vehicles. The MND attributes this

---

[4] Office of Environmental Health Hazard Assessment (OEHHA). Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments. February 2015. Accessed at: *https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf*.

estimate to input from an OC Public Works staff member but does not provide citation or supporting documentation explaining how this percentage was determined. An unsupported assumption regarding the proportion of diesel-powered vehicle trips is insufficient to establish that the Project's operational health risks would be less than significant. It is unclear whether the County's estimate accounts for potential future increases in the number of diesel-powered trucks owned by the County and serviced at the Project site. The MND does not provide evidence demonstrating that the assumed proportion of diesel-powered vehicle trips will remain representative of future operations. Accordingly, there is concern that the number of diesel-powered trucks serviced at the Project site could increase over time, resulting in greater diesel PM emissions that were not accounted for in the MND.

The MND further references a health risk screening analysis prepared by the California Air Pollution Control Officers Association (CAPCOA) for proposed land use projects, which identifies a screening distance of 1,000 feet for sensitive receptors located near distribution centers generating more than 100 truck deliveries per day. However, as shown in Figure 1, John F. Kennedy Elementary School shares a boundary with the Project site and is therefore well within CAPCOA's recommended 1,000-foot screening distance. Accordingly, the County cannot dismiss the potential operational health risks to the school without first conducting an adequate screening analysis based on a reasonably supported estimate of diesel-powered truck trips.

To adequately evaluate the Project’s potential operational health risk impacts, the County must first conduct a health risk screening analysis using a diesel truck trip estimate supported by substantial evidence. The assumed number and proportion of diesel-powered truck trips should be substantiated using historical traffic data, an appropriate traffic study, or other reliable supporting information. If the screening analysis identifies the potential for significant health risk impacts, the County must prepare an operational HRA and disclose the results in the Final MND.

The County Should Reduce Construction and Operational Emissions

The County concluded in Chapter 5.3 (Air Quality) of the MND that the Project’s operation and construction would result in a less-than-significant impact on regional air quality. As shown in Table 4 (Construction-Related Criteria Pollutant Emissions) and Table 5 (Operational Criteria Pollutant Emissions of the MND, all air pollutants modeled for Project construction and operation would be below the South Coast Air Quality Management District’s (SCAQMD) significance thresholds. Consequently, the County did not include additional mitigation measures to reduce the Project’s construction and operational air pollutant emissions.

Although the Project would not exceed the SCAQMD’s significance thresholds, it should be the County’s goal to reduce the Project’s air quality impacts as much as possible. The construction of the Project would temporarily expose nearby residences to harmful air pollution and would contribute to the existing significant air pollution burden in the

surrounding community. To reduce these impacts, CARB urges the County to include a project design measure in the Final MND requiring the Port to participate in CARB's California Clean Construction (CCC) program for the Project.

The CCC program is a voluntary initiative administered by CARB to accelerate the deployment of zero-emission and advanced clean off-road construction equipment across California. The program was developed as part of CARB's broader strategy to meet State Implementation Plan commitments and improve air quality in communities disproportionately burdened by diesel pollution, such as the community surrounding the Project. The program serves as a voluntary framework that recognizes and encourages fleets to go beyond existing regulations, such as CARB's In-Use Off-Road Diesel-Fueled Fleets Regulation. The program prioritizes the use of battery-electric, hydrogen fuel cell, and other zero-emission construction equipment where those technologies are commercially available, and where not, encourages the use of the cleanest available diesel equipment. CARB maintains a Zero-Emission Equipment List identifying eligible equipment models and provides guidance to awarding bodies on how to integrate clean construction criteria into bid specifications and contract documents.[5]

The construction of the Project will likely use many of the off-road equipment types identified on the Zero-Emission Equipment List. As presented in the MND, the County assumed in its construction emissions modeling that the Project would require the use of forklifts, rough terrain forklifts, excavators, rubber-tired dozers, graders, cranes, pavers, generators, tractors/loaders/backhoes, and other equipment, several types of which are available as zero-emission on the Zero-Emission Equipment List. CARB notes that the Project already commits to Tier 4 off-road equipment; the CCC program represents the next step beyond that commitment toward zero-emission construction.

In addition to participating in the CCC program, CARB urges the County to include the following recommended emission reduction strategies as enforceable project design features or mitigation measures in the FEIR:

- Ensure the cleanest possible construction practices and equipment are used. This includes eliminating the idling of diesel-powered equipment and providing the necessary infrastructure (e.g., electrical hookups) to support zero and near-zero equipment and tools.
- In construction contracts, require all off-road diesel-powered equipment used during construction to be equipped with Tier 4 Final engines with a diesel particulate filter, except for specialized construction equipment in which such engines are not

[5] California Clean Construction Program. Accessible at: *California Clean Construction Zero-Emission Equipment List | California Air Resources Board*.

available. Information on finding Tier 4 final equipment with a diesel particulate filter is available on CARB's website.[6]

- In construction contracts, require that all off-road equipment with a power rating below 19 kilowatts (e.g., plate compactors, pressure washers) used during construction be battery powered.
- In construction contracts, require all heavy-duty trucks entering the construction site during the grading and building construction phases to be zero-emission where feasible; if zero-emission trucks are not feasible, trucks must be model year 2017 or later. All heavy-duty haul trucks should also meet CARB's lowest optional low-NOx standard. [7]

In addition to transitioning construction equipment to zero-emission technologies, CARB urges the County to establish a commitment to transition its vehicle fleet to zero-emission vehicles. The County should use the development of the proposed Facility as an opportunity to establish a concrete commitment and implementation timeline for transitioning its vehicle and equipment fleet to zero-emission technologies. The Project proposes to support the maintenance, repair, parking, and storage of more than 3,000 County-owned vehicles and pieces of equipment, making this a significant opportunity to incorporate zero-emission fleet planning into the County's long-term operations. The County may be able to offset the costs of fleet electrification through existing CARB incentive programs, such as the Clean Truck and Bus Voucher Incentive Project (HVIP), Clean Off-Road Equipment Voucher Incentive Project (CORE) and Carl Moyer Memorial Air Quality Standards Attainment Program.[8,9,10]

Conclusion

CARB appreciates the opportunity to comment on the MND for the Project. Given the Project's proximity to John F. Kennedy Elementary School and nearby residences, CARB encourages the County to further evaluate opportunities to reduce diesel PM emissions and minimize potential health risks to the surrounding community. CARB recommends that the

---

[6] Optional Tier 4 Final + Diesel Particulate Filter Equipment. Accessible at *Optional Tier 4 Final + Diesel Particulate Filter Equipment* | California Air Resources Board.

[7] In 2013, CARB adopted optional low-NOx emission standards for on-road heavy-duty engines. CARB encourages engine manufacturers to introduce new technologies to reduce NOx emissions below the current mandatory on-road heavy-duty diesel engine emission standards for model-year 2010 and later. CARB's optional low-NOx emission standard is available at: *https://ww2.arb.ca.gov/our-work/programs/optional-reduced-nox-standards*

[8]Clean Truck and Bus Voucher Incentive Project. Accessible at *https://californiahvip.org/*

[9]Clean Off-Road Equipment Voucher Incentive Project. Accessible at *https://californiacore.org/*

[10] Carl Moyer Memorial Air Quality Standards Attainment Program. Accessible at *https://ww2.arb.ca.gov/Carl_Moyer*

County consider the additional health risk analyses and emission reduction measures discussed in this letter and incorporate appropriate measures into the Final MND to help protect the nearby community. In particular, the County should provide substantial evidence supporting its assumption that diesel-powered vehicles will account for only 5% of Project-related trips and address the potential for increases in diesel-powered trucks serviced at the facility over time.

Given the breadth and scope of projects subject to CEQA review throughout California that have air quality impacts, coupled with CARB's limited staff resources to substantively respond to all issues associated with a project, CARB must prioritize its substantive comments here based on staff time, resources, and its assessment of impacts. CARB's deliberate decision to comment on some issues does not constitute an admission or concession that it substantively agrees with the lead agency's findings and conclusions on any issues on which CARB does not submit comments.

CARB staff can provide assistance with zero-emission technologies and emission reduction strategies, as needed. Please include CARB on your list of selected State agencies that will receive the Final MND. If you have questions, please contact Stanley Armstrong, Air Pollution Specialist via email at *stanley.armstrong@arb.ca.gov*.

Sincerely,



Matthew O'Donnell, Chief, Risk Reduction Branch

cc: California State Clearinghouse
state.clearinghouse@lci.ca.gov

Kim Fortun, Professor, University of California Irvine
kfortun@uci.edu

Sam Wang, Program Supervisor, CEQA Intergovernmental Review, South Coast Air Quality Management District, South Coast Air Quality Management District
swang1@aqmd.gov

Stanley Armstrong, Air Pollution Specialist, Risk Reduction Branch

Alejandro (Alex) Sanchez, Air Pollution Specialist, Risk Reduction Branch