



South Coast  
Air Quality Management District

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E-mailed: May 21, 2010

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Mr. Tom Barnes  
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California Department of Water Resources  
707 Wilshire Blvd., Suite 1450  
Los Angeles, CA 90017

**Review of the Draft Environmental Impact Report (Draft EIR)  
for the Perris Dam Remediation Program Project**

The South Coast Air Quality Management District (AQMD) staff appreciates the opportunity to comment on the above-mentioned document including an extended review period. The following comment is intended to provide guidance to the lead agency and should be incorporated into the revised Draft or Final Environmental Impact Report (Draft or Final EIR) as appropriate.

The lead agency's air quality analysis demonstrates that criteria pollutants including Oxides of Nitrogen (NO<sub>x</sub>) and Particulate Matter (PM<sub>10</sub>) and PM<sub>2.5</sub> emissions exceed the AQMD's daily significance thresholds during project construction. As a result, the lead agency determined that the proposed project would create significant and unavoidable air quality impacts. Therefore, AQMD staff is concerned about the project's regional impacts on air quality and requests that the lead agency further mitigate the project's NO<sub>x</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> emissions based on recommendations in the attached comments.

Pursuant to California Public Resources Code §21092.5, please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. 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  
Planning, Rule Development & Area Sources

Attachment

IM:DG

RVC100204-05  
Control Number

**Air Quality Analysis and Mitigation Measures:**Regional Construction Mitigation Measures

1. In Section 3.2.3 (Air Quality Impacts and Mitigation Measures) the lead agency evaluated regional air quality impacts from construction activities that will occur at the project site. As a result, the lead agency's regional construction air quality analysis demonstrates that criteria pollutants including NO<sub>x</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> emissions exceed the AQMD's daily significance thresholds. Therefore, the AQMD recommends that the lead agency consider adding the following mitigation measures to further reduce NO<sub>x</sub> and PM<sub>2.5</sub> air quality impacts from the construction phase of the project, if feasible:

Construction Traffic (NO<sub>x</sub> and PM<sub>2.5</sub>):

- ❖ 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,
- ❖ Improve traffic flow by signal synchronization, and
- ❖ Require construction parking to be configured such that traffic interference is minimized.

Construction Equipment (NO<sub>x</sub> and PM<sub>2.5</sub>):

- ❖ Consistent with mitigation measures required for other projects in the South Coast Air Basin (e.g., Port of Long Beach and Port of Los Angeles projects), require all on-site construction equipment to meet EPA Tier 2 or higher emissions standards according to the following:
  - ✓ April 1, 2010, to December 31, 2011: All offroad diesel-powered construction equipment greater than 50 hp shall meet Tier 2 offroad emissions standards. In addition, all construction equipment shall be outfitted with the 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 2 or Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
  - ✓ January 1, 2012, to December 31, 2014: All offroad diesel-powered construction equipment greater than 50 hp shall meet Tier 3 offroad emissions standards. 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.

- ✓ Post-January 1, 2015: All offroad 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 AQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.

For additional measures to reduce off-road construction equipment, refer to the mitigation measure tables located at the following website:

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

Also, the lead agency should consider encouraging construction contractors to apply for AQMD "SOON" funds. Incentives could be provided for those construction contractors who apply for AQMD "SOON" funds. The "SOON" program provides up to \$60 million dollars 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/tao/Implementation/SOONProgram.htm>