



South Coast Air Quality Management District

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Planning Department
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Review of the Draft Environmental Impact Report (Draft EIR) for the Proposed Keller Crossing Specific Plan Project

The South Coast Air Quality Management District (AQMD) 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.

Based on a review of the draft EIR the AQMD staff is concerned about the significant regional and localized air quality impacts from the proposed project. Given that the project demonstrates significant air quality impacts and is adjacent to sensitive receptors (i.e., residences located south and west of the project site) the AQMD staff recommends that the lead agency require additional mitigation measures pursuant to Section 15126.4 of the CEQA Guidelines. Specifically, the lead agency should require mitigation that reduces local resident's exposure to construction related emissions and reduces the project's operational emissions from new vehicular trips generated by the project. Details regarding these comments are attached to this letter.

Pursuant to Public Resources Code Section 21092.5, please 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, slightly slanted style.

Ian MacMillan

Program Supervisor, CEQA Inter-Governmental Review
Planning, Rule Development & Area Sources

Attachment

IM:DG

RVC110810-05
Control Number

Regional and Localized Construction Mitigation Measures:

1. In Section 3.3 (Air Quality) of the draft EIR the lead agency determines that the project's regional and localized air quality impacts during construction will be significant from VOC, NOx, PM10 and PM2.5 emissions. Therefore, AQMD staff recommends that the lead agency provide additional mitigation measures pursuant to CEQA Guidelines Section 15126.4 including the following:

- Prohibit vehicle and engine idling in excess of five minutes and ensure that all off-road equipment is compliant with the California Air Resources Board's (CARB) in-use off-road diesel vehicle regulation and SCAQMD Rule 2449,
- Improve traffic flow by signal synchronization, and
- When sweeping streets to remove visible soil materials use SCAQMD Rule 1186 and 1186.1 certified street sweepers or roadway washing trucks, and

Further, to reduce NOx and PM2.5 emissions from off-road equipment the lead agency should revise mitigation measure AQ-3 as follows:

- During project construction, all internal combustion engines/construction, equipment operating on the project site shall meet EPA-Certified Tier 2 emissions standards, or higher according to the following:
 - ✓ Project Start, 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 SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.
- ✓ Encourage 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 funds 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>

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.

Mitigation Measures for Operational Air Quality Impacts

2. Based on the air quality analysis summarized in Section 3.3 of the draft EIR the AQMD staff is concerned about the project's operational air quality impacts. Specifically, the lead agency has determined that the project's operational phase will exceed the AQMD's CEQA significance thresholds resulting in significant regional and cumulative air quality impacts. The project's operational impacts are primarily from mobile source emissions (i.e., approximately 95%) related to the significant increase of vehicle trips associated with the proposed project. However, the lead agency fails to adequately address this increase in mobile source emissions and does not require any mitigation to address mobile source emission reductions from the proposed project. Therefore, the AQMD staff recommends that the lead agency minimize the project's significant air quality impacts by incorporating the transportation mitigation measures found in the greenhouse gas quantification report¹ published by the California Air Pollution Control Officer's Association in the final EIR.

¹ California Air Pollution Control Officer's Association. August 2010. Quantifying Greenhouse Gas Mitigation Measures. Accessed at: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>