



South Coast Air Quality Management District

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Mr. Art Diaz, Project Manager, aadiaz@rcflood.org
Riverside County Flood Control and Water
Conservation District
1995 Market Street
Riverside, CA 92501

Draft Mitigated Negative Declaration (Draft MND) for the Proposed Little Lake MDP Line B, Stages 1 and 2 Storm Drain 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 CEQA document.

In the project description, the lead agency proposes the construction, operation and maintenance of approximately 8,800 lineal feet of underground storm drain facilities and the reconstruction of approximately 20 lineal feet of the existing Meridian Street Channel. In addition, approximately 42,500 cubic yards of soil will be exported during Phase 2 of the proposed project. The proposed project is estimated to be completed within approximately 11 months with completion estimated in 2013.

In the Draft MND, the lead agency has analyzed air quality impacts including regional and greenhouse gas (GHG) air quality impacts using the California Emissions Estimator Model (CalEEMod). Based on the proposed construction activities, the AQMD staff also recommends that the lead agency evaluate localized construction air quality impacts since it is noted under Surrounding Land Uses on page 2 and in an aerial map inspection that several residences are located along route(s) of the proposed project. Therefore, AQMD staff requests that the lead agency evaluate localized air quality impacts¹ to ensure that any nearby sensitive receptors located within one-quarter mile of the project site are not adversely affected by the on-site construction activities that are occurring in close proximity.

In the event that the lead agency's revised CEQA document demonstrates significant adverse air quality impacts the AQMD staff recommends that the lead agency require mitigation that could minimize or eliminate significant air quality impacts pursuant to

¹ Localized Significance Thresholds guidance can be found at: <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>.

Mr. Art Diaz,
Project Manager

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CEQA Guidelines §15126.4 and/or §15070 in addition to the mitigation described on page 28 of the Draft MND.² Additional comments are included in the attachment.

Please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. The AQMD staff is available to work with the lead agency to address these issues and any other air quality questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,



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

IM:GM
Attachment

RVC120217-02
Control Number

²⁴ Mitigation measure suggestions can be found at http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html

Construction Mitigation Measures

- ❖ Should the lead agency determine that project construction impacts exceed the SCAQMD recommended significance threshold for NO_x (see also cover letter comment concerning localized construction impacts), the AQMD staff recommends the following additional mitigation measures during the projected 11-month construction period to further reduce NO_x impacts, if applicable and feasible.

Recommended Additions:

- Require the use of 2010 and newer diesel haul truck (e.g., material delivery trucks and soil import/export). If the lead agency determines that 2010 model year or newer diesel trucks cannot be obtained, the lead agency shall use trucks that meet EPA 2007 model year NO_x and PM₁₀ emission requirements.
- During project construction, all internal combustion engines/construction equipment operating on the project site shall meet EP-Certified Tier 2 emissions standards, or higher according to the following:
 - ✓ Project start to December 31, 2014: All off road diesel-powered construction equipment greater than 50 hp shall meet Tier 3 off road 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.
 - ✓ 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> .
 - ✓ Prohibit all vehicles from idling in excess of five minutes, both on- and off-site;
 - ✓ Reroute construction haul trucks away from congested streets or sensitive receptors areas.
 - ✓ 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.

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 .