



South Coast Air Quality Management District

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Mr. Kurt Heidelberg
California Department of Transportation, District 8
464 W. 4th St, MS-820
San Bernardino, CA 92401

Draft Mitigated Negative Declaration (Draft MND) for the Proposed Interstate 15/Limonite Avenue Interchange Improvements 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 MND. In the project description, the lead agency proposes to widen Limonite Avenue from four lanes to six lanes and improve the existing freeway interchange at Interstate 15 (I-15) and Limonite Avenue.

In the Air Quality Section, the lead agency quantified the project's construction air quality impacts using Sacramento Metropolitan Air Quality Management District's Roadway Construction Emissions Model version 7_1_3. SCAQMD staff recommends that the lead agency recalculate its air quality impacts using the newest version of the Roadway Construction Emissions Model (Version of 7.1.5.1)¹.

The location of the proposed project is adjacent to sensitive land uses² (i.e., residential dwellings west of the project site), the Draft MND did not evaluate potential localized air quality impacts that could result from the construction and operation of the proposed project. Therefore, the SCAQMD staff recommends that the Lead Agency revise the air quality analysis to include an assessment of potential localized air quality impacts of the proposed project. These potential air quality impacts should be assessed using SCAQMD's Localized Significance Methodology and compared to the localized significance thresholds specific to the project area³.

Furthermore, the lead agency determined that NOx emissions will exceed the significance thresholds during construction and mitigation measures will be implemented to reduce emissions to less than significant without providing documentation to support this determination. SCAQMD staff recommends providing additional information to quantify the emission reductions that may occur from implementing the proposed mitigation measures as well as adding additional mitigation measures to further reduce NOx emissions. Please see the following attachment for the recommended mitigation measures.

¹ Sacramento Metropolitan Air Quality Management District's Roadway Construction Emissions
The newest version can be found at: <http://www.airquality.org/ceqa/>

² 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>

³ The Localized Significance Threshold (LST) methodology and Mass Rate LST Look Up Table is available at:
<http://www.aqmd.gov/ceqa/handbook/LST/LST.html>

The SCAQMD staff is available to work with the Lead Agency to address these concerns and any other air quality questions that may arise. Please contact Jack Cheng, Air Quality Specialist at (909) 396-2448, if you have any questions regarding these comments. We look forward to reviewing the Final MND associated with this project.

Sincerely,

Barbara Radlein

Barbara Radlein
Program Supervisor
Planning, Rule Development & Area Sources

BR:JC
RVC150722-02
Control Number
Attachment

Recommended Mitigation Measures

Based on the air quality analysis in the Draft MND, the lead agency determined that the proposed project will result in significant regional air quality impacts during construction. Therefore, SCAQMD staff recommends that, pursuant to Section 15126.4 of the CEQA Guidelines, the following measures be included in the Final MND, in addition to the measures proposed by the lead agency, in order to minimize or eliminate significant adverse air quality impacts during construction.

Construction Mitigation Measures

- Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export) and 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 NOx emissions requirements.
- Consistent with measures that other lead agencies in the South Coast Air Basin (including Port of Los Angeles, Port of Long Beach, Metro and City of Los Angeles)⁴ have enacted, require all on-site construction equipment to meet the following:
 - All off road 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 SCAQMD "SOON" funds. Incentives could be provided for those construction contractors who apply for SCAQMD "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/home/programs/business/business-detail?title=off-road-diesel-engines>.
- Require the use of electricity from power poles rather than temporary diesel or gasoline power generators, when feasible.
- Provide temporary traffic controls such as a flag person, during all phases of significant construction activity to maintain smooth traffic flow.
- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site.
- Reroute construction trucks away from congested streets or sensitive receptor areas.
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation.
- Improve traffic flow by signal synchronization.
- Limit soil disturbance to the amounts analyzed in the Draft MND.
- All materials transported off-site shall securely covered.
- Reduce traffic speeds on all unpaved roads to 15 mph or less.
- Construct or build with materials that do not require painting.
- Require the use of pre-painted construction materials.

⁴ For example see the Metro Green Construction Policy at:
http://www.metro.net/projects_studies/sustainability/images/Green_Construction_Policy.pdf