



South Coast Air Quality Management District

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FAXED: September 28, 2010

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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 construction 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 strongly recommends that the lead agency provide additional mitigation measures to further reduce air quality impacts from the construction phase of the proposed project.

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 "Ed Eckerle". The signature is written in a cursive style with a large initial "E".

Ed Eckerle
Program Supervisor
Planning, Rule Development & Area Sources

Attachment

EE:DG

RVC100817-04
Control Number

Regional and Localized Construction Mitigation Measures:

1. In Section 3.3 (Air Quality) of the draft EIR the lead agency summarizes the project's regional and localized construction air quality impacts. The lead agency's evaluation of the project's regional and localized air quality impacts during project construction demonstrate significant air quality impacts from VOC, NO_x, PM₁₀ and PM_{2.5} emissions. Therefore, AQMD staff recommends that the lead agency add the following mitigation measures to further reduce air quality impacts from the construction phase of the project, if feasible:

- 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,
- 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,
- Schedule construction activities that affect traffic flow on the arterial system to off-peak hours to the extent practicable,
- Reroute construction trucks away from congested streets or sensitive receptor areas,
- Improve traffic flow by signal synchronization,
- Ensure that all vehicles and equipment will be properly tuned and maintained according to manufacturers' specifications,
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM₁₀ generation,
- When sweeping streets to remove visible soil materials use SCAQMD Rule 1186 and 1186.1 certified street sweepers or roadway washing trucks, and
- Replace ground cover in disturbed areas as quickly as possible.

Further, to reduce NO_x and PM_{2.5} emissions from off-road equipment, AQMD staff recommends that the lead agency revise mitigation measure AQ-4 as follows:

- During construction activity, the contractor shall require the highest available tier of emissions standards ~~will utilize CARB tier II Certified or better for the following pieces of for all construction equipment used at the project site: rubber-tired dozers, rubber-tired loaders, and scrapers.~~

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.