



South Coast
Air Quality Management District

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E-Mailed: April 15, 2011
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Mr. Jason Simpson
City of Desert Hot Springs
65-950 Pierson Blvd
Desert Hot Springs, CA 92240

**Review of the Draft Environmental Impact Report (Draft EIR) for the Proposed
2011 Amendment to the Merged Desert Hot Springs Redevelopment 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.

The AQMD staff is concerned about the significant regional air quality impacts and greenhouse (GHG) gas emissions impacts from the proposed project. As a result, AQMD staff recommends that pursuant to Section 15126.4 of the California Environmental Quality Act (CEQA) Guidelines additional mitigation measures are considered to minimize the significant air quality and GHG emissions impacts from the proposed project. Details regarding these comments are attached to this letter.

Pursuant to Public Resources Code Section 21092.5, AQMD staff requests that the lead agency provide the AQMD 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,



Ian MacMillan

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

Attachment

IM:DG

RVC110301-03
Control Number

Mitigation Measures for Construction Air Quality Impacts

1. Given that the lead agency concluded that the proposed project will have significant construction related air quality impacts the AQMD staff recommends that the lead agency revise the second paragraph of mitigation measure AQ-5 to ensure that the requirements identified in this measure effectively (i.e., enforceable and quantitative) reduce the project's air quality impacts. Specifically, AQMD staff recommends that the lead agency revise the aforementioned paragraph in AQ-5 as follows:

AQ 5 (second paragraph):

~~Although not made a condition of adoption of the Redevelopment Plan, the following additional mitigation measures are recommended for consideration for reducing~~ *shall be required to reduce* construction emissions at the time a site-specific project is proposed:

Further, AQMD staff recommends that the lead agency minimize the project's significant adverse air quality impacts by adding the mitigation measures provided below.

- 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 Greenhouse Gasses and Operational Air Quality Impacts

2. The lead agency's air quality analysis demonstrates significant operational air quality impacts from criteria pollutant emissions including NO_x, CO, VOC, PM₁₀ and PM_{2.5} emissions. Further, the lead agency's climate change analysis demonstrates significant impacts from GHG's. These impacts are primarily from mobile source emissions related to vehicle trips associated with the proposed project. However, the lead agency fails to adequately address this large source of emissions. Specifically, the lead agency does not require or evaluate any mitigation measures to address these transportation-related emissions in the draft EIR. Therefore, the lead agency should reduce the project's significant air quality impacts by reviewing and incorporating transportation mitigation measures from 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>