



South Coast
Air Quality Management District
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E-Mailed: April 1, 2011
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Ms. Tricia D. Thrasher
Attn: Glen Mor 2 Student Apartments Project
UCR Office of Design and Construction
Riverside, CA 92507

**Review of the Draft Environmental Impact Report (Draft EIR)
for the Proposed UC Riverside Glen Mor 2 Student Apartments 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 localized air quality impacts from the proposed project; therefore, the lead agency should include additional mitigation measures in the final EIR that minimize the project's localized air quality impacts. Further, AQMD staff requests that the lead agency revise mitigation measures AQ-1 and AQ-2 (page 3.2-12 of the draft EIR) for the final EIR to ensure that the proposed measures will achieve the required emission reductions. 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

RVC110218-05
Control Number

Mitigation Measures for Regional Construction Air Quality Impacts

1. The lead agency relies on mitigation measures AQ-1 and AQ-2 to demonstrate that the proposed project will impose less than significant air quality impacts on the environment. Specifically, the lead agency's air quality analysis accounts for a 73% reduction in PM10 emissions from off-road construction equipment and a 40% reduction in NOX emissions from on-road heavy-duty trucks from AQ-1 and AQ-2. However, AQMD staff is concerned about the stated effectiveness of these mitigation measures given the lack of specificity in each measure. For example, implementing the mitigation measures as stated could potentially yield reductions that are less than required to achieve a less than significant impact. Therefore, the AQMD staff recommends that the lead agency revise AQ-1 and AQ-2 to ensure less than significant air quality impacts as follows:

AQ 1: Construction-Period Engine/Equipment Emissions

The UCR Office of Design and Construction will ensure that all construction contracts specify that all internal combustion engines/construction equipment operating on the project site:

- Meet EPA-certified Tier 2 emissions standards or higher, and
- At a minimum, achieve an overall 73% control efficiency of PM10 emissions.

AQ 2: Construction-Period Engine/Equipment Oxides Catalyst

The UCR Office of Design and Construction will ensure that all construction contracts specify that all off-road equipment operating on the project site, as well as all on-road heavy-duty vehicles (including hauling and material delivery trucks) traveling to and from the site, will be fitted with oxides catalyst that at minimum achieve a 40% reduction in NOX emissions.

Mitigation Measures for Significant Localized Construction Air Quality Impacts

2. Given that the lead agency concluded that the proposed project will have significant localized and cumulative construction air quality impacts the AQMD staff recommends that the lead agency provide additional mitigation pursuant to CEQA Guidelines §15126.4. Specifically, AQMD staff recommends that the lead agency minimize or eliminate significant adverse air quality impacts by adding the mitigation measures provided below.
 - 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,
 - 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, and ensure that all vehicles and equipment will be properly tuned and maintained according to manufacturers' specifications,
- Use coatings and solvents with a VOC content lower than that required under AQMD Rule 1113,
- Construct or build with materials that do not require painting,
- Require the use of pre-painted construction materials,
- 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 (i.e., if project construction goes beyond anticipated schedule).
 - ✓ 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.