



South Coast
Air Quality Management District
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**Draft Mitigated Negative Declaration (Draft MND) for the Proposed I-15/I-215
Devore Interchange Improvements Project**

The South Coast Air Quality Management District (SCAQMD) 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 improvements to the interchange of Interstate 15 (I-15) and Interstate 215 (I-215) near the unincorporated community of Devore in southwestern San Bernardino County. The proposed project limits extend along I-15 from approximately 0.8 miles south of the Glen Helen Parkway undercrossing to 1.4 miles north of the Kenwood Avenue undercrossing, and along I-215 from 1.2 miles south of the Devore Road overcrossing to the I-15 junction. Construction is scheduled to begin in 2013 and conclude in 2015-2016.

AQMD staff is concerned that although the lead agency has analyzed air quality impacts including daily project operational PM_{2.5} and PM₁₀ impacts and localized CO impacts for 1-hour and 8-hour standards, the Draft MND does not include a quantified estimate of emissions from construction activities for this project, as required by CEQA. Without quantifying emissions, the lead agency has not provided the substantial evidence that is needed to determine that impacts are less than significant. The AQMD staff therefore recommends that the lead agency include construction air quality impacts in the Final MND. Guidance for existing air quality models that can assist in estimating regional air quality impacts can be found on the AQMD CEQA website¹ and in the AQMD CEQA Air Quality Handbook.²

The AQMD staff also recommends that the lead agency evaluate localized construction air quality impacts since it is noted under Existing and Future Land Use starting on page 2.1-1 and in Figure 1.1-2 in the Draft MND, that several residences are located on the north side of the freeway on the north side of the I-15/I-215 junction and some residences are located on the north side of the I-215 leg. Therefore, AQMD staff requests that the lead agency evaluate localized air quality impacts³ to ensure that any nearby sensitive receptors located within one-quarter mile of the project site are not adversely affected by the construction activities that are occurring in close proximity.

AQMD staff further recommends that the lead agency use thresholds of significance to determine the significance of any project air quality impacts based on CEQA Guidelines §15064.7. This would include thresholds that the lead agency develops, publishes, and adopts itself or utilizes from previously adopted thresholds of significance that other public agencies have developed provided that the decision to adopt such thresholds is supported by substantial evidence. AQMD staff encourages the lead agency to use the thresholds of significance that the AQMD has developed for projects within its jurisdiction and that are available on the AQMD website.

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 CEQA Guidelines §15370 in addition to the measures described on page 2.13-31 of the Draft MND.⁴

Please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. The SCAQMD staff would be 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
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Attachment

IM:GM

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¹ AQMD website can be accessed at <http://www.aqmd.gov/ceqa/>

² The SCAQMD CEQA Air Quality Analysis Handbook is available from SCAQMD Subscription Services by calling (909) 396-3720. Supplementary guidance is also available on the SCAQMD website at: <http://www.aqmd.gov/ceqa/hdbk.html>.

³ Localized Significance Thresholds guidance can be found at: <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>

⁴ Mitigation measure suggestions can be found at http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html

Construction Air Quality Mitigation Measures

1. In the event that the lead agency determines that project construction emissions will exceed the AQMD's daily significance thresholds for criteria pollutants, the AQMD staff recommends the following change and additional measures in addition to the measures proposed starting on page 2.13-31 in the Air Quality Section of the Draft MND to further reduce air quality impacts from the project, if feasible.

Recommended Changes:

AQ-5 Should the project geologist determine that asbestos-containing materials (ACMs) are present at the proposed project study area during final inspection prior to construction, the appropriate methods including adherence to SCAQMD Rule 1403 – Asbestos Removal will be implemented to remove ACMs.

Recommended Additions:

- Apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more);
 - Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 mph;
 - Prohibit truck idling in excess of five minutes, on- and off-site;
 - Use electricity from power poles rather than temporary diesel or gasoline power generators;
 - Apply water three times daily, or non-toxic soil stabilizers according to manufacturers' specifications, to all unpaved parking or staging areas or unpaved road surfaces;
 - Sweep streets at the end of the day if visible soil is carried onto adjacent public paved roads (recommend water sweepers with reclaimed water);
 - Use street sweepers that comply with SCAQMD Rules 1186 and 1186.1;
 - Use electricity from power poles rather than temporary diesel or gasoline power generators;
 - Traffic speeds on all unpaved roads to be reduced to 15 mph or less; and
 - Reroute construction haul trucks away from congested streets or sensitive receptor areas.
2. Further, other lead agencies in the region including the Port of Los Angeles and Port of Long Beach have also enacted the following mitigation measures. AQMD staff recommends the following measures to further reduce air quality impacts from construction equipment exhaust:

- April 1, 2010, to December 31, 2011: All off-road diesel-powered construction equipment greater than 50 hp shall meet Tier 2 off-road 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 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.
- Post-January 1, 2015: 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 AQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.

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.