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Western Municipal Water District
14205 Meridian Parkway
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Review of the Supplemental Environmental Impact Report (Supplemental EIR) for the Riverside-Corona Feeder Realignment Project

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document. The following comment is intended to provide guidance to the lead agency and should be incorporated into the final Environmental Impact Report (EIR) as appropriate.

Based on a review of the draft EIR the AQMD staff is concerned about the significant construction-related air quality impacts from the proposed project. In order to reduce regional air quality impacts, AQMD staff recommends that the lead agency require additional mitigation to reduce diesel equipment exhaust emissions during construction activities.

Pursuant to Public Resources Code Section 21092.5, please 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

RVC110121-03
Control Number

Construction Mitigation Measures

1. Given that the lead agency's regional and localized construction air quality analysis demonstrates that the criteria pollutant emissions will exceed the AQMD's daily significance thresholds for NOX, PM10 and PM2.5 for each of the proposed project alternatives the lead agency should consider adding the following mitigation measures to further reduce air quality impacts from the project, if feasible:

    - Configure construction parking to minimize traffic interference,
    - Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site,
    - Reroute construction trucks away from 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,
    - Consistent with measures that other lead agencies in the region (including Port of Los Angeles and Port of Long Beach) have enacted, require all on-site construction equipment to meet EPA Tier 2 or higher emissions standards according to the following:

        ✓ April 1, 2010, 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 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.

- The lead agency should consider encouraging construction contractors to apply for AQMD "SOON" funds. As an example, incentives could be provided in the bidding process for those construction contractors who apply for AQMD "SOON" funds. More information on this program can be found at the following website: http://www.aqmd.gov/tao/Implementation/SOONProgram.htm

In addition to the mitigation measures, AQMD staff recommends modifying the existing mitigation measures as follows:

- **MM Air 2:** During construction of the proposed improvements require the use of electricity from power poles rather than temporary diesel or gasoline power generators ~~one of the following options must be used to supply the power needs for boring/tunneling operations: 1) use natural gas fueled generator sets; 2) use low emission, duel fueled generator sets; or 3) prior to construction of the proposed improvements, arrangements will be made with Southern California Edison to provide temporary construction power at the boring/tunneling sites (67 % reduction)~~[1].