



South Coast Air Quality Management District

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SENT VIA USPS AND E-MAIL:
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August 29, 2014

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Planning & Community Development Department
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Draft Environmental Impact Report (Draft EIR) for the Proposed Pedley Shopping Center Project (SCH NO. 2008121072)

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 if possible, should be incorporated into the Final CEQA document. However, in recognition of the fact that these comments are being sent after the close of the comment period specified by the lead agency, we request that at a minimum, these comments be included as part of the public record.

The SCAQMD staff has concerns regarding the air quality analyses. Specifically, the analyses should include all applicable emission sources and estimates for regional and localized impacts to demonstrate the Lead Agency's findings. There is additional concern about potentially adverse localized construction air quality impacts to the residents located adjacent to the project site and other sensitive receptors from activities that include the blasting that will occur over the next 18-months since this area of Riverside County has some of the highest levels of PM10 in the Basin. In addition, the proposed project should incorporate all feasible mitigation to reduce significant impacts in the Final EIR. Finally, the Lead Agency should cite in the Final EIR that permits would be required from the SCAQMD for the rock crushing system and control equipment used at the site during the 18 month construction period. Further details are included in the attachment.

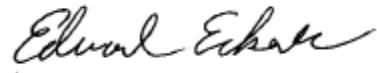
The SCAQMD staff would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Ms. Laurie Lovret,
Senior Planner

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August 29, 2014

Sincerely,

A handwritten signature in cursive script that reads "Edward Eckerle".

Edward A. Eckerle
Program Supervisor
Planning, Rule Development & Area Sources

Attachment

EE:RM:GM

RVC140708-03
Control Number

Construction Air Quality Analysis

Mass LST Rate Lookup Tables Used for Construction Blasting Activities

1. In the air quality section, the lead agency has evaluated localized construction impacts using the recommended emission thresholds of significance from the SCAQMD Mass Lookup Tables¹ available at the SCAQMD website. Although the lookup table thresholds can be used for many construction projects, these thresholds do not take into account emissions from the proposed project's construction blasting activities. Therefore, the lead agency should re-evaluate localized impacts to include blasting impacts to ensure that nearby sensitive receptors located east, southeast and southwest of the proposed project site are not adversely affected by the proposed construction activities. Additional comments concerning the air quality analysis are included in the attachment.
2. In the air quality section, the lead agency includes regional estimates for construction activities in Table 4.2-6 (Construction Activities – Maximum Daily Emissions and Table 4.2-7 (Maximum Daily Emissions with Blasting). Table 4.2-9 (LST and Project Emissions) includes localized emission impact estimates (see comment in the cover letter).
 - Table 4.2-6 regional emissions are listed by year as unmitigated and mitigated but each source and related emissions are not identified in the table. The SCAQMD staff recommends that Table 4.2-6 be revised to identify the major emission sources, e.g., soil disturbance, on- and off-site equipment, building construction, architectural coating, etc., to clarify what emission sources and emission estimates the table is disclosing.
 - Table 4.2-7 (Maximum Daily Emissions with Blasting) should be revised in the Final EIR to include regional peak daily emission estimates from all construction sources, i.e., blasting, grading, any cut/fill, soil hauling, on- and off-site equipment, trenching, architectural coating, paving, blasting, etc.
 - Table 4.2-9 (LST and Project Emissions) should also be revised in the Final EIR to include localized peak daily emission estimates from all on-site construction sources, i.e., blasting, grading, any cut/fill, on-site equipment, trenching, architectural coating, paving, etc

Mitigation Measures - Construction

3. During the construction phase, the lead agency has determined that project regional emissions will exceed the recommended SCAQMD daily thresholds of significance for NOx (during grading and blasting), CO (during blasting), PM10 (localized - during site preparation) , PM2.5 (localized – during site preparation and grading) and

¹ SCAQMD Mass Rate LST Lookup Tables: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds> .

ROG (from architectural coating. Further analysis may also determine whether localized construction impacts are also significant (see comment #1). Therefore, the SCAQMD staff recommends the following change and additional measures be incorporated into the Final EIR pursuant to Section 15126.4 of the CEQA Guidelines in addition to the mitigation measures included in the Air Quality Section starting on page 4.2-24 to further reduce significant construction significant air quality impacts, if feasible:

Recommended Change:

MM 4.2-1

- Public streets shall be swept daily to remove soil tracked onto the paved surface by vehicles leaving the construction site. Recommend using SCAQMD Rule 1186 certified street sweepers or roadway washing trucks if visible soil materials are carried to adjacent streets (recommend water sweepers with reclaimed water). Any visible soil track-out ~~extending more than 50 feet from the access point that creates dust beyond the project boundaries~~ shall be swept or washed twice per day, ~~or as needed,~~ and one sweeping or washing shall occur after the last truck of the day exits the site.

PM10 (Fugitive Dust)

- Limit soil disturbance and blasting activity to the daily amounts analyzed in the Draft EIR.
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation.
- Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 miles per hour.
- Install wheel washers where vehicles enter and exit the construction site onto paved roads or wash off trucks and any equipment leaving the site each trip.
- Apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more).
- 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;
- Replace ground cover in disturbed areas as quickly as possible.
- Pave road and road shoulders, and
- Traffic speeds on all unpaved roads to be reduced to 15 mph or less.

NOx and CO Mitigation Measures

- Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export) and if the lead agency determines that 2010 model

year or newer diesel trucks cannot be obtained the lead agency shall use trucks that meet EPA 2007 model year NOx emissions requirements.

- Replace the portion of Mitigation Measure 4.2.2 shown on page 4.2-26 as follows:

~~To reduce construction vehicle emissions, contractor specification packages shall require the following emissions controls for all excavators, graders, dozers, scrapers, and tractor/loader/backhoes used during grading operations.~~

- ~~○ All heavy equipment shall meet Tier 3 off road emissions standards or better.~~

- Consistent with measures that other lead agencies in the region (including Port of Los Angeles, Port of Long Beach, Metro and City of Los Angeles)² have enacted, require all on-site construction equipment to meet EPA Tier 3 or higher emissions standards according to the following:
 - ✓ Project start, 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.
 - ✓ Encourage construction contractors to apply for SCAQMD “SOON” funds. Incentives could be provided for those construction contractors who apply for SCAQMD “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> .

² For example see the Metro Green Construction Policy at:
http://www.metro.net/projects_studies/sustainability/images/Green_Construction_Policy.pdf

- ✓ 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.

Other Measures

- Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow.
- All heavy equipment shall use Level 3 Diesel Particulate Filters (DPF) to reduce PM10 and PM2.5 emissions.
- All heavy equipment shall use Diesel Oxidation Catalysts capable of achieving a 40 percent reduction in NOx.
- 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.
- Require the use of electricity from power poles rather than temporary diesel or gasoline power generators.
- Prohibit truck idling in excess of five minutes, on- and off-site.

Additional measures to reduce off-road construction equipment emissions pursuant to Section 15126.4 of the California Environmental Quality Act (CEQA) Guidelines are available in the mitigation measure tables located on the SCAQMD website.³

Permit Requirements for Rock Crushing System and Control Equipment

4. During construction, rock crushing operation activities will occur during the approximately 18 month construction phase in order to reduce oversize rocks that cannot be placed into fill. This will involve approximately 1.8 million cubic yards of material hauled offsite resulting in approximately 225,000 total haul trips traveling an average distance of 15-miles each way to disposal sites that were not identified in the Draft EIR. The SCAQMD reminds the lead agency that the rock crushing system including the control equipment would require permits from the SCAQMD. Due to the length of the construction period, this equipment could be considered permanent equipment and not temporary in nature. Permit requirement questions for the rock crushing system and related construction equipment can be directed to SCAQMD Engineering and Compliance staff at (909) 396-2591. The disposal site(s) locations omitted in the Draft EIR should also be included in the Final EIR and, if needed, applicable analyses should be revised if the distance is greater than the 15-mile one way trip length assumed in the air quality analysis.

³ Offsite construction equipment mitigation measure tables:
<http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies> .