



South Coast  
Air Quality Management District

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**Review of the Draft Environmental Impact Report (Draft EIR)  
for the Proposed Redlands Downtown General Plan and Specific 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 proposed project's significant air quality impacts from NOX emissions during construction-related activity. Therefore, the lead agency should 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 revising mitigation measure AQ10 (Page 4.2-25) of the draft EIR as follows:

AQ10 The City shall require construction contractors to utilize diesel powered construction equipment that meets EPA-Certified Tier III emissions requirements emissions standards, or higher according to the following:

- ✓ January 1, 2012, to December 31, 2014: All offroad diesel-powered construction equipment greater than 50 hp shall meet Tier 3 offroad emissions standards at a minimum. 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>

Further, in Table 4.2-6 (Daily Construction Emissions Unmitigated) on page 4.2-20 of the draft EIR the lead agency summarizes the project's regional and localized construction air quality impacts. Based on footnote d of the aforementioned table the evaluation of the project's localized construction air quality impacts assumes that only four (4) acres of the project site will be disturbed per day. Therefore, the AQMD staff recommends that the lead agency provide a mitigation measure that limits construction activity to 4 acres per day to ensure consistency with the project's construction emissions analysis.

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

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