



South Coast Air Quality Management District

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E-MAILED:

October 9, 2012

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**Draft Initial Study/Environmental Assessment/Mitigated Negative Declaration
(Draft IS/EA/MND) for the Proposed Interstate 10/Jefferson Street Interchange
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 to reconstruct and realign Jefferson Street at the I-10/Jefferson Street interchange in the City of Indio. Construction activities would include a partial cloverleaf-type interchange with loop and diamond on-ramps, a new eight-lane capacity overcrossing for I-10, six-lanes for traffic on the applicable portion of Jefferson Street and other improvements. The new overcrossing and interchange ramps would also require removal of the existing Jefferson Street overcrossing and the northbound Indio Boulevard overcrossing. Construction would begin in December 2013 and last approximately one year.

Although the lead agency has analyzed daily project operational PM_{2.5} and PM₁₀ impacts and localized CO impacts for 1-hour and 8-hour standards in the Draft MND, project regional and localized construction impacts were not estimated, 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

¹ AQMD website can 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> .

The AQMD staff also recommends that the lead agency evaluate localized construction air quality impacts since it is noted on page 171 and in Figures 1-3A and 1-3B (Alternative 1 Area) in the Draft MND, that several residences are located north of the proposed project site. Therefore, the 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 use such thresholds is supported by substantial evidence. AQMD staff encourages the lead agency to use all of 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 §15070 in addition to the measures described starting on page 180 of the Draft MND.⁴ Additional details are included in the attachment.

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
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Attachment

IM:GM

RVC110930-01
Control Number

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

- ❖ Should the lead agency determine after its analyses that construction air quality impacts will exceed the AQMD's daily significance thresholds for criteria pollutants, the AQMD staff recommends the following changes and additional mitigation measures to reduce project impacts in addition to the measures proposed starting on page 180 in the Air Quality Section of the Draft MND, if feasible:

Recommended Changes:

Mitigation Measure AQ-1:

- (b) Discontinue operation during ~~second~~-first-stage smog alerts.
- (k) Cease grading during periods when winds exceed (as instantaneous gusts) 25 mph.

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).
- Use electricity from power poles rather than temporary diesel or gasoline power generators.
- Prohibit truck idling in excess of five minutes, on- and off-site.
- 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.
- 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.

Further, other lead agencies in the region including LA County Metro, the Port of Los Angeles, and the 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:

- 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.

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 .