



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS
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May 29, 2014

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Caltrans District 8
Division of Environmental Planning
464 West 4th Street, 6th Floor MS 827
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Draft Negative Declaration/Environmental Assessment
(Draft ND/EA) for the Proposed State Route 21/Pepper Street Avenue New
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.

The lead agency proposes the construction of a new tight diamond interchange along State Route (SR) 210 at Pepper Avenue in portions of Rialto, San Bernardino and unincorporated San Bernardino County. The total length of the project is approximately 0.8 of a mile and would include widening of Pepper Avenue between Highland Avenue south of the new east-bound on-ramps. Additional construction would include retaining walls, dedicated turn lanes, traffic signal controls, and other improvements. Construction is expected to last approximately five years with the opening year scheduled for 2016.

In the air quality analysis, 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 addition, regional and localized construction emission impacts using the Sacramento Roadway Emissions Model were estimated and compared with the SCAQMD recommended daily significance thresholds. Based on the regional analysis, daily construction NO_x emissions exceeded the recommended SCAQMD regional daily significance threshold for NO_x. In Table 2-28 (Estimate of Criteria Pollutant Emissions During Construction) on page 2-128, it is not clear if the emissions shown include the effects of the mitigation included in the Draft ND starting on page 12-135. If not, the SCAQMD recommends that mitigated construction impacts be included in the Final ND. Further, if regional construction NO_x impacts remain significant, the SCAQMD recommends additional measures listed in the attachment to reduce or minimize construction NO_x emission impacts in addition to the mitigation measures included in the Draft ND starting on page 2-135.

Mr. James Shankel,
Senior Environmental Planner

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Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final ND. The SCAQMD staff is available 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.

Sincerely,



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

Attachment

EE:GM
Attachment

SBC140520-01
Control Number

Additional Construction Mitigation Measures

1. 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.
2. 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)¹ 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.
 - ✓ 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 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>

For additional measures to reduce off-road construction equipment and other construction impacts, refer to the mitigation measure tables located at the SCAQMD website.²

¹ For example see the Metro Green Construction Policy at:
http://www.metro.net/projects_studies/sustainability/images/Green_Construction_Policy.pdf

² www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html