South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

FAXED: MAY 22, 2008 May 22, 2008

Mr. Andy Huneck
Transportation Department
County of Riverside
3525 14th Street
Riverside, CA 92501

Draft Mitigated Negative Declaration (Draft MND) for the proposed Murrieta Road Widening 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 Mitigated Negative Declaration.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final Mitigated Negative Delation. 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.

Sincerely,

Steve Smith
Program Supervisor – CEQA Section
Planning, Rule Development & Area Sources

Attachment

SS:GM

RVC080422-05
Control Number

Construction Air Quality Analysis

Localized Significance Thresholds

1. As noted in Section G on page 13 and illustrated in Figures 4a and 4b of the Draft MND, the proposed project is adjacent to sensitive receptors (residential properties) on both sides and along some stretches of the proposed road widening project. Therefore, the SCAQMD requests that the lead agency evaluate localized air quality impacts to ensure that any nearby sensitive receptors are not adversely affected by the construction activities that are occurring in close proximity. SCAQMD guidance for performing a localized air quality analysis can be found at the following web address: http://www.aqmd.gov/ceqa/handbook/LST/LST.html .

PM2.5 Significance Thresholds

2. In response to adoption of PM2.5 ambient air quality standards by U.S. EPA and CARB, SCAQMD staff has developed a methodology for calculating PM2.5 emissions when preparing air quality analyses for California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) documents. To determine if PM2.5 air quality impacts are significant, SCAQMD staff has also developed recommended regional and localized significance thresholds. The SCAQMD has requested that PM2.5 emissions be calculated since January 2007. Because the lead agency has not quantified PM2.5 impacts, staff requests that a PM2.5 significance analysis to be included in the Final MND. Guidance for performing a PM2.5 analysis can be found at the following URL: http://www.aqmd.gov/ceqa/handbook/PM2_5/PM2_5.html Further, SCAQMD staff has compiled mitigation measures to be implemented if the PM2.5 impacts or other pollutant air quality impacts are determined to be significant. Mitigation measure suggestions can be found at http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html

On-Road and Off-Road Emission Factors

3. Review of Appendix B of the Air Quality Impact Assessment (Appendix A to the Draft MND) indicates that the lead agency calculated construction emissions using the Sacramento Metropolitan AQMD's Roadway Construction Emissions Model, Version 5.2. The problem with using this version of the model is that it uses outdated on-road and off-toad emission factors (EMFAC2002 and CARB's old OFFROAD model, respectively). The SCAQMD, therefore, requests that the construction emissions be revised using the most current on-road and off-road emission factors (EMFAC2007 and OFFROAD2007, respectively). The Sacramento Metropolitan AQMD recently released version 6.2 of their model, which can be used to revise the construction emissions analysis.

Construction Mitigation Measures

4. Should the lead agency, after final review (see comment #1), determine that the short-term (construction) air quality impacts from the proposed project are estimated to exceed established daily significance thresholds for nitrogen oxide (NO_x), and particulate matter (PM10), the SCAQMD recommends that the lead agency consider modifying the following mitigation measures and adding additional mitigation measures to further reduce construction air quality impacts from the project, if applicable and feasible:

   The following changes are recommended for Mitigation Measures to reduce fugitive dust:

   - All disturbed areas, including storage piles, which are not being actively utilized for construction purposes (areas inactive for ten days or more), shall be effectively stabilized of dust emissions using water, SCAQMD approved chemical stabilizer/suppressant applied according to manufacturers' specifications, covered with tarp or other suitable cover or vegetative ground cover.
   - All on-site unpaved roads and off-site unpaved access roads shall be effectively stabilized of dust emissions using water or chemical stabilizer/suppressant applied according to manufacturers' specifications.
   - Within urban areas, track out shall be immediately removed when it extends 50 or more feet from the site and at the end of each workday.

   Particulates

   The SCAQMD requests that the lead agency modify the first and third bullet points on page 38 to specify that when stabilizing dust emissions with water, at least two applications per day should be required.

   The following is a list of additional recommended mitigation measures to further reduce fugitive dust emissions:

   - 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.
   - 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 mph;
   - Water active sites at least twice daily;

NO_x Emissions

The following is a list of additional recommended mitigation measures to further reduce NOx emissions:

- Prohibit all diesel truck idling in excess of five minutes, both on- and off-site;
- Require construction equipment that meet or exceed Tier 2 standards and equip construction equipment with oxidation catalysts, particulate traps, or other verified/certified technologies, etc.;
- All vehicles and equipment will be properly tuned and maintained according to manufacturers' specifications;
- Use electricity from power poles rather than temporary diesel or gasoline power generators;
- Configure construction parking to minimize traffic interference;
- Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow;
- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site;
- Schedule construction activities that affect traffic flow on the arterial system to off-peak hour to the extent practicable;
- Reroute construction trucks away from congested streets or sensitive receptor areas; and
- Use alternative clean fueled off-road equipment or give extra points in the bidding process for contractors committing to use such equipment.