



South Coast Air Quality Management District

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Review of the Draft Environmental Impact Report (Draft EIR) for the Proposed Spring Trails 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.

Based on a review of the draft EIR the AQMD staff is concerned about the project's construction air quality impacts and greenhouse (GHG) emissions impacts. Specifically, the lead agency has determined that the project's construction emissions will exceed the AQMD's CEQA significance thresholds for NO_x, PM₁₀ and PM_{2.5} resulting in significant regional, localized and cumulative air quality impacts. Further, the project will have significant GHG emissions impacts that are primarily from mobile sources related to a substantial increase of vehicle trips associated with the proposed project's operations. However, the lead agency fails to adequately address this increase in mobile source emissions and does not require any mitigation measures to address mobile source emissions reductions. Therefore, the AQMD staff recommends that the lead agency minimize the project's significant air quality impacts and GHG emissions impacts by requiring additional mitigation pursuant to Section 15126.4 of the CEQA Guidelines. Details regarding these comments are attached to this letter.

AQMD 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](#)

SBC110802-01
Control Number

Mitigation Measures for Construction Air Quality Impacts

1. The lead agency concluded that the proposed project will have significant construction-related air quality impacts. Specifically, the lead agency determined that the project will have significant NO_x, PM₁₀ and PM_{2.5} emissions. Therefore, AQMD staff recommends that the lead agency consider additional mitigation measures pursuant to CEQA Guidelines Section 15126.4 including the following
 - 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,
 - Reroute construction trucks away from congested streets or sensitive receptor areas,
 - Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM₁₀ generation,
 - Improve traffic flow by signal synchronization, and ensure that all vehicles and equipment will be properly tuned and maintained according to manufacturers' specifications, and
 - Require the use of the cleanest burning diesel haul trucks available, such as trucks that meet 2010 model year EPA standards.

Further, the AQMD staff recommends that the lead agency revise air quality mitigation measure 2-3 as follows:

- During project construction, all construction, equipment operating on the project site shall meet EPA-Certified Tier 3 emissions standards, or higher according to the following:
 - ✓ Project Start, to December 31, 2014: All offroad diesel-powered construction equipment greater than 50 hp shall meet Tier 3 offroad 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 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>

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.

Mitigation Measures for Greenhouse Gas Emissions Impacts

2. Based on a review of the GHG Emissions Analysis (Section 5.16 of the draft EIR) the AQMD staff is concerned about the project's significant GHG emissions impacts. Specifically, the lead agency determined that a substantial amount of GHG emissions will be emitted during the project's operational phase from transportation sources. Also, the lead agency determined that the project would be inconsistent with regional transportation strategies (e.g., SCAG Compass Blueprint) intended to reduce vehicle miles traveled (VMT). As a result, the lead agency concluded that the project's substantial GHG emissions and inconsistent transportation measures result in significant GHG impacts.

Further, under SB 375 SCAG is required to develop a sustainable community strategy (SCS) as a part of the 2012 RTP that achieves regional GHG reduction targets of 8% per capita for the planning year 2020 and 13% per capita for 2035. However, the lead agency has not stipulated specific mitigation measures or targets to reduce the substantial (i.e., approximately 50%) increase in mobile source emissions allowed under the proposed project. Therefore, pursuant to Section 15126.4 of the CEQA Guideline and consistent with the SCS the lead agency should minimize the project's significant air quality impacts by incorporating the transportation mitigation measures found in the greenhouse gas quantification report¹ published by the California Air Pollution Control Officer's Association in the final EIR.

¹ California Air Pollution Control Officer's Association. August 2010. Quantifying Greenhouse Gas Mitigation Measures. Accessed at: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>