



South Coast Air Quality Management District

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E-Mailed: October 30, 2013
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Mr. Charles LaClaire
City of Menifee
29714 Haun Road
Menifee, CA 92586

Review of the Draft Environmental Impact Report (Draft EIR) for the City of Menifee General Plan Project

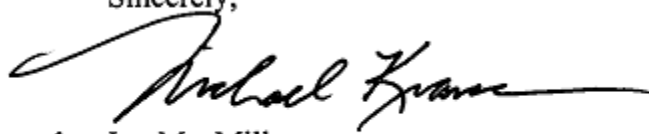
The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are intended to provide guidance to the Lead Agency and should be incorporated into the revised Draft or Final Environmental Impact Report (Draft or Final EIR) as appropriate.

Based on a review of the air quality analysis in the Draft EIR the SCAQMD staff is concerned about the potential health risk impacts from placing sensitive receptors (e.g., residences) within close proximity to the Interstate 215 Freeway (i.e., a known significant emissions source) and other potentially significant emissions sources (e.g., industrial, light industrial and heavy commercial land uses). Specifically, the Lead Agency concluded the project will not result in significant health risk impacts to sensitive receptors near major sources of air pollutants with the implementation of Mitigation Measure 3-2, however, the SCAQMD staff is concerned that this measure is not sufficient to reduce the project's potential health risk impacts to an insignificant level. Therefore, the SCAQMD staff recommends that the Lead Agency modify air quality mitigation measure #3-2 to reflect the revisions enclosed. Further, SCAQMD staff recommends that the Lead Agency provide revised/additional mitigation measures to minimize the project's significant regional construction and operational air quality impacts and greenhouse gas (GHG) emissions pursuant to Section 15126.4 of the California Environmental Quality Act (CEQA) Guidelines. Details regarding these comments are attached to this letter.

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 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,

A handwritten signature in black ink, appearing to read "Michael Francis". The signature is fluid and cursive, with a long horizontal stroke at the end.

for Ian MacMillan
Program Supervisor, Inter-Governmental Review
Planning, Rule Development & Area Sources

Attachment

MK:DG

RVC130913-04
Control Number

Health Risk Assessment Mitigation Measures

1. The SCAQMD staff is concerned that the proposed project could pose significant health risk impacts to residents from emissions sources that have not been quantified in the Draft EIR. Specifically, the Lead Agency is proposing new land use designations that could include sensitive land uses (e.g., The Economic Development Corridor land use allows for residential, commercial and other uses) adjacent to the Interstate 215 Freeway (See Figure ES-4) a prominent source of TACs. Further, the Lead Agency determined that the project will not result in significant health risk impacts to future sensitive receptors with the inclusion of Mitigation Measure #3-2. However, the SCAQMD staff is concerned that this measure is not sufficient to reduce the project's potential health risk impacts to an insignificant level. Therefore, the AQMD staff recommends that the Lead Agency revise air quality mitigation measure #3-2 as follows:

The City shall require project applicants for residential or residential mixed-use projects within: 1) 1,000 feet from the truck bays of an existing distribution centers that accommodate more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units, or where transport refrigeration unit operations exceed 300 hours per week; 2) 1,000 feet of an industrial facility which emits toxic air contaminants; or 3) 500 feet of Interstate 215 (I-215) to submit a health risk assessment (HRA) prepared in accordance with policies and procedures of the state Office of Environmental Health Hazard Assessment (OEHHA) and the South Coast Air Quality Management District (SCAQMD).

- The HRA shall be submitted to the Community Development Director/appropriate designee and the SCAQMD for review and comment prior to approval of any future discretionary residential or residential mixed-use project that places sensitive land uses within the above specified buffers. If the HRA shows that the incremental cancer risk exceeds the SCAQMD's adopted CEQA Thresholds the one in one hundred thousand (1.0E-05), the appropriate noncancer hazard index exceeds 1.0, or if the PM_{10} or $PM_{2.5}$ ambient air quality standard increment exceeds $2.5 \mu\text{g}/\text{m}^3$, the City shall require mitigation measures necessary to reduce the health risks (for indoor and outdoor uses) below SCAQMD's adopted thresholds. Further, the HRA shall identify all mitigation measures necessary including, but, not limited to the level of high-efficiency Minimum Efficiency Reporting Value (MERV) filter required to reduce indoor air concentrations of pollutants to achieve the cancer and/or noncancer threshold. If upon incorporation of mitigation the proposed project exceeds SCAQMD adopted CEQA significance thresholds the City shall comply with the CEQA requirements of the Public Resources Code Section 21000 -21177.

The applicant shall be required to install high efficiency MERV filters in the intake of residential ventilation systems, consistent with the recommendations of the HRA. Heating, air conditioning and ventilation (HVAC) systems shall be installed with a fan unit power designed to force air through the MERV filter. To ensure long-term maintenance and replacement of the MERV filters in the individual units, the following shall occur:

- a) Developer, sale, and/or rental representative shall provide notification to all affected tenants/residents of the potential health risk for affected units.
- b) For rental units, the owner/property manager shall maintain and replace MERV filters in accordance with the manufacture's recommendations. The property owner shall inform renters of increased risk of exposure to diesel particulates when windows are open.
- c) For residential owned units, the Homeowner's Association (HOA) shall incorporate requirements for long-term maintenance in the Covenant Conditions and Restrictions and inform homeowners of their responsibility to maintain the MERV filter in accordance with the manufacturer's recommendations. The HOA shall inform homeowners of increased risk of exposure to diesel particulates when windows are open.
- d) Outdoor active-use public recreational areas associated with development projects shall be located more than 500 feet from the nearest lane of traffic on the I-215 unless risk are below the thresholds identified above.

Operational Mitigation Measures

2. The Lead Agency determined that the proposed project will exceed the CEQA regional operational significance thresholds for NO_x, SO_x, VOC, CO, PM₁₀ and PM_{2.5} emissions. Further, the Lead Agency concluded the project will result in significant GHG emissions. Therefore, SCAQMD staff recommends that the Lead Agency provide the following additional mitigation measures pursuant to CEQA Guidelines Section 15126.4.

Additional Operational Mitigation Measures - Energy Efficiency

- a) Maximize use of solar energy including solar panels; installing the maximum possible number of solar energy arrays on the building roofs and/or on the project site to generate solar energy for the facility.
- b) Use passive heating, natural cooling, solar hot water systems, and reduced pavement.
- c) Require all lighting fixtures, including signage, to be energy efficient. Where feasible, use solar powered lighting and limit the hours of operation of outdoor lighting.
- d) Utilize only Energy Star heating, cooling, and general appliances.
- e) Install light colored "cool" roofs and cool pavements.

Additional Operational Mitigation Measures – Transportation

- f) Provide electric car charging stations for tenants. Also, provide designated areas for parking of zero emission vehicles (ZEVs) for car-sharing programs.
- g) Provide incentives for employees and the public to use public transportation such as discounted transit passes and/or other incentives.
- h) Create local "light vehicle" networks, such as neighborhood electric vehicle (NEV) systems.

- i) Require the use of 2010 compliant diesel trucks, or alternatively fueled, delivery trucks (e.g., food, retail and vendor supply delivery trucks) at commercial/retail sites upon project build-out. If this isn't feasible, consider other measures such as incentives, phase-in schedules for clean trucks, etc.

Additional Operational Mitigation Measures - Other

- j) Require use of water-based or low VOC cleaning products.
- k) Require use of electric lawn mowers and leaf blowers.
- l) Require use of electric or alternatively fueled sweepers with HEPA filters.
- m) Require the use of electric or alternative fueled maintenance vehicles.

Construction Mitigation Measures

3. The Lead Agency determined that the proposed project will exceed the CEQA regional construction significance thresholds for NO_x, SO_x, VOC, CO, PM₁₀ and PM_{2.5} emissions. Further, the Lead Agency concluded the project will result in significant GHG emissions. Therefore, SCAQMD staff recommends that the Lead Agency provide the following revised/additional mitigation measures pursuant to CEQA Guidelines Section 15126.4.
 - a) Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow.
 - b) Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site.
 - c) Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM₁₀ generation.
 - d) Improve traffic flow by signal synchronization, and ensure that all vehicles and equipment will be properly tuned and maintained according to manufacturers' specifications.
 - e) Require the use of electricity from power poles rather than temporary diesel or gasoline power generators.
 - f) 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 NO_x emissions requirements.
 - g) During project construction, all internal combustion engines/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 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, refer to the mitigation measure tables located at the following website:
www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html.