



South Coast Air Quality Management District

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Review of Early Drafts of the Air Quality and Greenhouse Gas Elements for the General Plan Update 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 draft general plan and considered in the environmental document as appropriate. With the incorporation of additional air quality policies and revisions to existing draft policies (see below) this comprehensive plan provides a pathway for the county to minimize localized and regional air quality impacts from future growth and reach its goal of achieving 1990 greenhouse gas (GHG) emission levels by 2020.

1) Air Quality Policies (Pollution Control Policies-Page AQ-15)

Given the significant local and regional air quality challenges in the South Coast Air Basin, especially in the Inland Empire, it is imperative that local land use plans maximize opportunities to reduce localized and regional air quality impacts. Specifically, as extensively discussed in the latest air quality management plan (2012 AQMP) the region must reduce regional NOx emissions by 65% by 2023 and 75% by 2032 to attain the 8-hour ozone NAAQS as required by federal law¹. Given the diversity of land uses that facilitate regional economic and population growth in Southern California it is crucial that land use agencies provide comprehensive land use policies that minimize local and regional air quality impacts. Therefore, the SCAQMD staff recommends that in addition to the policies provided in the air quality element of the Draft GPU the lead agency include revised and additional policies that address the topics below.

Sensitive Receptors/Localized Air Quality Impact

- Revise Policy AQ 2.1 and 2.2 to include thresholds designed to ensure that sensitive receptors are protected from potentially significant health impacts. Specifically, the lead agency should incorporate the SCAQMD's CEQA localized significance thresholds and discourage future land use operational activities that exceed these thresholds. In addition, the policies should apply to all emission

¹ <http://www.aqmd.gov/aqmp/2012aqmp/Final-February2013/Ch4.pdf>

sources, including significant mobile sources such as warehouses, rail yards, and freeways, not just point sources (such as power plants).

Transportation Policies

- Encourage expansion of the electric vehicle (EV) charging station network.
- Encourage a local light vehicle network.
- Encourage improved local circulation to facilitate non-motorized transportation (e.g., bike facilities, pedestrian access, etc).
- Encourage expanded use of mass transit.
- Encourage consistency with the adopted 2012 Regional Transportation Plan / Sustainable Community Strategy (RTP/SCS).

Energy and Other

- Encourage 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 sites to generate solar energy for the facility.
- Encourage energy efficient lighting and appliances. Where feasible use solar powered lighting.
- Encourage light colored paving and roofing materials.
- Encourage use of water-based or low VOC cleaning products at the project.
- Encourage the use of electric and low emission construction and maintenance equipment.

2) Goods Movement (Mobile Pollution Sources – Section AQ 3)

Goods movement activities are a significant part of the existing regional land use setting in the county and given the growth projections for this industrial sector it is critical that local general plans address their land use needs. Therefore, SCAQMD staff recommends that the lead agency incorporate policies in the Draft GPU that will ensure local land use compatibility and minimize the potential localized and regional air quality impacts. Specifically, the SCAQMD staff recommends that the lead agency incorporate policies that address the following:

- Encourage zero and near-zero emissions technology (see page 41 of the Goods Movement Chapter in the RTP).²
- Until zero emission trucks are available, the lead agency should encourage the use of other lower emitting trucks, such as natural gas powered trucks. While diesel trucks are the most common truck technology used today, the lead agency could encourage diesel haul trucks that meet 2010 model year standards, or at a minimum those that meet 2007 model year standards.
- Require consistency with the recommended guidelines and strategies in the Good Neighbor Guidelines for Siting New and/or Modified Warehouse Distribution Facilities published by the Western Riverside Council of Governments.³

² <http://scagrtp.net/MediaViewer/10944?print=true>

³ <http://www.wrcog.cog.ca.us/downloads/Good+Neighbor+Policies+Final-091205.pdf>

3) Greenhouse Gas Emissions (Climate Action Plan)

The lead agency established a Climate Action Plan that requires the County to reduce GHG emissions by 15% below 2008 level by 2020. However, SCAQMD staff is concerned that if the emissions growth rate exceeds anticipated 2020 levels then the proposed CAP may not contain sufficient contingency and enforcement measures to ensure consistency with the goals of AB32. As an example, if 2020 emissions levels are above the projected 6.04 MMTCO_{2e} per year then the proposed emissions target (15% below 2008 level) may be inadequate. In order to address this possibility, the lead agency has proposed a monitoring and reporting program. However, the lead agency did not provide specific information about enforcement of this program. Therefore, SCAQMD staff requests that the lead agency provide additional details for the monitoring and reporting program (e.g., duration between reviews of the emissions inventory, enforcement mechanisms, compliance issues, etc.) and include further discussion on measures to remedy excess emissions if the results of the interim inventory compilation process require a revision of the CAP.

SCAQMD staff is available to work with the lead agency to address these issues and any other air quality 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

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