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Mr. Nick Liguori, Deputy Director of Community Development
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Review of a Draft Environmental Impact Report (EIR) for the Falloncrest at the Preserve Master Plan Project

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. SCAQMD staff is concerned about the methodology used to develop proposed project concentrations for the localized significance threshold evaluation and greenhouse gas emissions evaluation. Detailed comments are attached to this cover letter.

We appreciate your willingness to consider these comments and would appreciate a written response pursuant to CEQA Guidelines §15088 (b) prior to the lead agency making any decision on this project. Should you have any questions, don't hesitate to contact James Koizumi at (909) 396-3234.

Sincerely,

Edward Eckerle
Program Supervisor
Planning, Rule Development & Area Sources

Attachment

SBC140613-05
Control Number
EE:JK

Emission Factors

- The particulate emission factor for drylot/corrals was listed as 2.3 pound per year per animal unit (AU) in the AQ Emissions spreadsheet of the Excel file Existing Land use Emission Factors.xlsx. Land use was listed as 86.25 acres and the resulting emissions were estimated to be 198 pounds per year. Based on this, AUs would be equivalent to acres. However, based on the number of animals (3,800 cows and 5,800) it is unclear that the conversion is valid for this proposed project. Clarification should be provided in the Final EIR.

Localized Significance Thresholds

- Based on the SCREEN3 output for mitigated nitrogen dioxide (NO2) from construction provided to SCAQMD staff, it appears that the average NO2 construction emissions were used to estimate one-hour concentration. Peak NO2 emission rates should be used to estimate short term (one-hour) NO2 concentrations.

Greenhouse Gas Evaluation

- Based on a review of the Greenhouse Gas (GHG) Report of the Draft EIR the lead agency has determined that the proposed project will achieve a GHG reduction of 34.3 to 35.4 percent below business-as-usual (BAU), also below the threshold of 15 percent. The GHG Report states that the BAU scenario is consistent with the California Air Resources Board's (CARB's) definition of BAU. Specifically, the BAU scenario "reflects development of the project site pursuant to the Falloncrest Master Plan absent of design features, operational programs, mitigation measures, and state requirements established by AB 32." To accomplish this, the proposed project was modeled with CalEEMod using the operational year of 2005. It is unclear how this BAU scenario is consistent with the Climate Change Scoping Plan (http://www.arb.ca.gov/cc/scopingplan/document/appendices_volume1.pdf) prepared by CARB. By calculating emissions as if the proposed project was built in 2005, the EIR assumes that the proposed project is consistent with CARB's baseline scenario, not the BAU scenario. Instead the analysis should calculate emissions based on adopted rules and regulations from 2005, for the proposed project's expected opening year in 2018. CARB's BAU analysis assumed changes would occur post 2005, such as reduced future emissions due to already adopted vehicle emission standards. If these 2005-era adopted regulations are not considered, then the EIR's BAU scenario will be artificially inflated, and the proposed project's presumed benefits will be overstated.

Mitigation

- Mitigation measure MM AQ-3 requires that all construction equipment be CARB Tier 3 certified or better. Since NOx emissions exceed the SCAQMD regional significance threshold of 100 pounds per day, the mitigation measure should require CARB Tier 4 certified equipment if available.
- Mitigation measure MM AQ-3 requires that during grading activity total energy output from equipment is required to be less than 32,872 horsepower-hours per day and the maximum disturbance (actively graded) area would be limited to less than or equal to eight acres per day. If the NO2 concentrations modeled with AERMOD are greater than 0.18 parts per million, additional mitigation should be applied to reduce NO2 concentrations to below 0.18 parts per million or as close to 0.18 parts per million as possible in the Final EIR.

- Mitigation Measure MM AQ-7 requires mandatory solar power in the commercial core. The Draft EIR states that at the time of development, the mixed use/commercial core development area of the Falloncrest Master Plan (approximately 155,194 square feet of commercial/retail) would be required to provide photo-voltaic/solar power to the maximum extent feasible given the roof space available and ultimate design of the commercial/retail buildings located in the commercial core. Mitigation MM AQ-8 requires mandatory solar power on community recreational facilities. The Draft EIR states that community recreational facilities (community pool, clubhouse) would be required to provide photo-voltaic/solar power to the maximum extent feasible given the roof space available and ultimate design of these buildings. GHG emissions are mitigated by photo-voltaic/solar power (see Table 4.3-20 in the Draft EIR). However, no documentation is provided that allows the public to verify that the amount of energy reduced by photo-voltaic/solar power related to the proposed project is feasible and enforceable. The Final EIR should include detailed documentation (assumptions, references, estimation methodology) that demonstrates that the amount of energy by photo-voltaic/solar power related to the proposed project is feasible and enforceable.