



South Coast Air Quality Management District

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November 14, 2016

Mr. Russell Brady, Project Planner
Riverside County Planning Department
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**Review of the Draft Environmental Impact Report (DEIR) for
The Villages of Lakeview Specific Plan No. 342, General Plan Amendment No. 720
and 721, Change of Zone No. 7055, and Development Agreement No. 73. 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 either a Revised Draft or Final Environmental Impact Report (Final EIR) as appropriate.

Pursuant to Public Resources Code Section 21092.5, SCAQMD staff requests that the Lead Agency 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 Gordon Mize, Air Quality Specialist CEQA Section, at (909) 396-3302, if you have any questions regarding the enclosed comments.

Sincerely,

Jillian Wong

Jillian Wong, Ph.D.
Planning and Rules Manager
Planning, Rule Development & Area Sources

Attachment

JW:JC:GM

RVC160930-03
Control Number

Air Quality Analysis

1. In Tables 5.3-D and 5.3-E, regional construction and operational impacts are estimated and compared with the respective construction and operational thresholds of significance. Based on the project construction schedule,¹ construction and operation emissions will begin to overlap starting after Phase 1 is completed. In the case of overlapping construction and operation emissions, both within a phase and between phases, the overlapping construction and operational emissions should be compared to the applicable regional operational significance threshold. SCAQMD staff understands that applying the applicable operational regional significance thresholds to the analysis results may not change the Lead Agency's significance determination, but for clarification, the Lead Agency should reflect the overlapping emission impacts and revise Tables' 5.3-D and 5.3-E in the Final EIR.

Health Risk Assessments (HRA)

2. On July 27, 2006 the SCAQMD staff submitted a comment letter on the Notice of Preparation providing guidance on performing a mobile source health risk assessment (HRA).² However, the Lead Agency evaluated health risks in the DEIR according to the Sacramento Metropolitan AQMD's (SMAQMD) protocol for evaluating the location of sensitive land uses adjacent to major roadways. Since the proposed project is located in the South Coast Air Basin, SCAQMD staff recommends the Lead Agency revise the dispersion modeling and mobile source health risk assessment (HRA) using SCAQMD's mobile source health risk assessment guidance³ and AERMOD (current version 15181).⁴

Mitigation Measure 1: Vegetative Barriers

3. The Lead Agency recommends using vegetative landscaping with deodar trees to reduce particulate matter by up to 55 to 80 percent at low wind speeds. According to the study cited, deodar achieves those removal efficiencies at wind speeds less than 1 meter/second. The average wind speed at the Riverside meteorological station is 1.74

¹ DEIR, Air Quality Technical Report (Ramboll Environ US Corp., May 2015): Table 3. Land Uses Construction by Phase and Table 4. Construction Schedule Assumptions.

² SCAQMD July 27, 2006 Notice of Preparation letter: \\F1\pta_fs\CEQA\IGR\IGR Comment Letters\Igr2006\2006 Comment Letters\Comment Letters July 2006\725-03.doc .

³ "Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis" Accessed at:

<http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>

⁴ The American Meteorological Society/Environmental Protection Agency Regulatory Model Improvement Committee (AERMIC) was formed to introduce state-of-the-art modeling concepts into the EPA's air quality models. Through AERMIC, a modeling system, AERMOD, was introduced that incorporated air dispersion based on planetary boundary layer turbulence structure and scaling concepts, including treatment of both surface and elevated sources, and both simple and complex terrain. As of December 9, 2006, AERMOD is fully promulgated as a replacement to ISC3, in accordance with [Appendix W \(http://www.epa.gov/ttn/scram/dispersion_prefrec.htm\)](http://www.epa.gov/ttn/scram/dispersion_prefrec.htm). AERMOD is a steady-state plume model that incorporates air dispersion based on planetary boundary layer turbulence structure and scaling concepts, including treatment of both surface and elevated sources, and both simple and complex terrain.

meter/seconds. Therefore, the use of vegetative barriers might not be as effective as claimed in the DEIR.

According to the EPA's Recommendations for Constructing Roadside Vegetation Barriers to Improve Near-Road Air Quality Planning Guide⁵, gaps in vegetative barriers can lead to increased pollutant concentrations downwind. Furthermore, the proposed vegetative barriers would require several years to reach full maturity (width, height, and density); therefore, creating potential gaps and increased pollutant concentrations downwind. The EPA also recommends extending the barrier at least 50 meters laterally beyond the area of concern in order to maximize reductions in downwind concentrations. The Lead Agency proposes constructing residential dwellings immediately adjoining the highway and would not maximize the benefit of a vegetative barrier.

Nutriline Facility HRA

4. In the Nutrilite HRA, the Lead Agency used Annual Facility Emissions data from 2005. 2015 Annual Facility Emissions data is now available⁶. Emissions data from 2015 is significantly higher than 2005 data for toxic air contaminants and increases the health risks from the facility beyond what was discussed in the Recirculated DEIR. SCAQMD staff recommends reevaluating the potential health risks using the 2015 emissions data.

Compliance With SCAQMD Rules

5. The Lead Agency describes potential soil disturbance activities that include existing diesel fuel and gasoline tanks located in various areas at the site.⁷ If soil has hydrocarbon contaminants, (e.g., contains petroleum hydrocarbons, etc.), the soil disturbance activities would be subject to SCAQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil. Compliance with Rule 1166 should be included in the Final EIR.
6. Since the Project is considered a large operation (50 acre sites or more of disturbed surface area; or daily earth-moving operations of 3,850 cubic yards or more on three days in any year) in the South Coast Air Basin, the Lead Agency is required to comply with all SCAQMD Rule 403(e) – Additional Requirements for Large Operations. This may include but not limited to Large Operation Notification, appropriate signage, additional dust control measures, and employment of a dust control supervisor that has successfully completed the Dust Control in the South Coast Air Basin training class. Therefore, the Final EIR should contain a detailed

⁵ EPA Recommendations for Constructing Roadside Vegetation Barriers to Improve Near-Road Air Quality Planning Guide: https://cfpub.epa.gov/si/si_public_file_download.cfm?p_download_id=528612

⁶ SCAQMD FIND Website: http://www3.aqmd.gov/webappl/fim/prog/emission.aspx?fac_id=12362

⁷ *Ibid*, Section 5.7 – Hazards, Page 5.7-15.

description of how the Project will comply with [Rule 403\(e\)](#). Please contact dustcontrol@aqmd.gov for more information.⁸

- Additional requirements include but are not limited to:
 - Implementation of Table 2 of Rule 403 at all times and implementation of the actions specified in Table 3 of Rule 403 when applicable.
 - Submittal of a fully executed Large Operation Notification to the Executive Officer.
 - Maintenance of daily records to document the specific dust control actions taken.
 - Installation and maintenance of project signage with project contact person that meets the minimum standards of Rule 403 Implementation Handbook.
 - Identification of a dust control supervisor that has completed the SCAQMD Fugitive Dust Control Class.

Construction Mitigation Measures

7. In addition to the air quality mitigation measures (MM AQ 1 through MM AQ 4) proposed starting on page 5.3-51, the SCAQMD staff recommends that the Lead Agency consider the following change and additional mitigation measures to further reduce the significant air quality impacts from the construction portion of the project:

Recommended Change:

- ~~MM AQ 2: During grading phases, all project developers shall use construction equipment ((i.e., scrapers, dozers, and tractors/loaders/backhoes) that is United States Environmental Protection Agency (USEPA) Tier 3 certified. All off-road 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. Proof of compliance shall be reviewed by the Department of Building and Safety's Grading Division prior to issuance of grading permits.~~

⁸ SCAQMD Compliance and Enforcement Staff Contact Information for Rule 403 Large Operations: (909) 396-2608.

Recommended Additional Mitigation Measures:NOx:

- 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 cleanup of off-road diesel vehicles, such as heavy duty construction equipment.⁹
- 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 NOx emissions requirements.
- Require the use of alternative fueled off-road construction equipment.
- Improve traffic flow by signal synchronization.
- Have truck routes clearly marked with trailblazer signs, so trucks will not enter residential areas.

Fugitive Dust:

- Limit soil disturbance to the amounts analyzed in the Final EIR.
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation.
- All materials including dirt, sand, soil, or other loose materials transported off-site shall be securely covered.
- Suspend all excavating and grading operations when wind gusts (as instantaneous gusts) exceed 25 mph.
- Apply water at least three times daily, or non-toxic soil stabilizers according to manufacturers’ specifications, to all unpaved parking or staging areas or unpaved road surfaces;
- When sweeping streets to remove visible soil materials, use SCAQMD Rule 1186 and 1186.1 certified street sweepers or roadway washing trucks.
- Pave road and road shoulders.
- Traffic speeds on all unpaved roads to be reduced to 15 mph or less.
- Require the application of non-toxic soil stabilizers according to manufacturers’ specifications to all inactive construction areas (previously graded areas inactive for ten days or more).
- Replace ground cover in disturbed areas as quickly as possible.

⁹ More information on this program can be found at the following SCAQMD website:
<http://www.aqmd.gov/home/programs/business/business-detail?title=off-road-diesel-engines>.

VOC

- Use coatings and solvents with a VOC content lower than that required under SCAQMD Rule 1113.
- Construct or build with materials that do not require painting.
- Require the use of pre-painted construction materials.

Operational Mitigation Measures

8. Based on Table 5.3-E, the Lead Agency has determined that the proposed project will generate significant operational emissions. Therefore, the SCAQMD staff recommends the following two additional mitigation measures:

1,000 Foot Buffer Between Industrial Facilities and Sensitive Receptors

- According to Figure 5.9-3 most of the land uses surrounding the proposed project are zoned as agriculture, residential, rural mountainous, commercial retail, and light industrial. Since the proposed project is largely residential, open space, and some commercial, the SCAQMD staff recommends protecting sensitive receptors including residents from potential adjacent future projects that may include heavy industry or facilities that attract heavy-duty diesel trucks. The SCAQMD staff requests that the Lead Agency include a mitigation measure that would prohibit heavy industrial facilities or facilities that attract heavy-duty diesel trucks from locating within 1,000 feet from the project boundaries.

Electric Vehicle (EV) Charging Stations

- Vehicles that can operate at least partially on electricity have the ability to substantially reduce the significant NOx impacts from this project. It is important to make this electrical infrastructure available when the project is built so that it is ready when this technology becomes commercially available. For both commercial and residential uses, the cost of installing electrical charging equipment onsite is significantly cheaper if completed when the project is built compared to retrofitting an existing commercial building or residence. Therefore, the SCAQMD staff recommends the Lead Agency require the proposed project to be constructed with the appropriate infrastructure to facilitate sufficient electric charging for vehicles to plug-in. For commercial uses, the SCAQMD staff recommends that the Lead Agency require at least 5% of all vehicle parking spaces include EV charging stations. For residences, the SCAQMD staff recommends that homes be appropriately wired from the electrical panel to later allow residents to install electrical chargers, if desired. At a minimum, commercial and residential electrical panels should appropriately-sized to allow for future expanded use.

Limits to MM AQ 6 - Enhanced Filtration Units

9. The Lead Agency should consider the limitations of the proposed mitigation for this project (enhanced filtration) on housing residents. For example, in a study that SCAQMD conducted to investigate filters¹⁰ similar to those proposed for this project, costs were expected to range from \$120 to \$240 per year to replace each filter. In addition, because the filters would not have any effectiveness unless the HVAC system is running, there may be increased energy costs to the resident. The proposed mitigation assumes that the filters operate 100 percent of the time while residents are indoors and does not account for the times when the residents have their windows or doors open or are in common space areas of the project. These filters also have no ability to filter out any toxic gasses from vehicle exhaust. The presumed effectiveness and feasibility of this mitigation should therefore be evaluated in more detail prior to assuming that it will sufficiently alleviate near roadway exposures.

¹⁰ This study evaluated filters rated MERV 13+ while the proposed mitigation calls for less effective MERV 12 or better filters. Accessed at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf>.