



# South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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## **Draft Environmental Impact Report (Draft EIR) for the Proposed East Lake Specific Plan Amendment No. 11 Project**

The South Coast Air Quality Management District (SCAQMD) staff 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 EIR.

### Project Description and Air Quality Analysis

The Lead Agency proposes to amend the existing East Lake Specific Plan (ELSP). The ELSP is a guide for the development of approximately 2,950 acres at the southern end of the City of Lake Elsinore. The proposed project may include a mixture of recreational, action sports, concert venue, commercial, industrial, residential, and preservation uses. In the Air Quality Section, the Lead Agency quantified the proposed project's construction and operational air quality emissions and compared those emissions to the SCAQMD's regional and localized air quality CEQA significance thresholds to determine the significance of air quality impacts. Based on the analyses, the Lead Agency found that the proposed project's construction and operational air impacts would be significant and unavoidable after mitigation<sup>1</sup>.

### SCAQMD's 2016 Air Quality Management Plan

On March 3, 2017, the SCAQMD's Governing Board adopted the 2016 Air Quality Management Plan (2016 AQMP), which was later approved by the California Air Resources Board of Directors on March 23<sup>rd</sup>. The 2016 AQMP<sup>2</sup> is a regional blueprint for achieving air quality standards and healthful air in the South Coast Air Basin. Built upon the progress in implementing the 2007 and 2012 AQMPs, the 2016 AQMP provides a regional perspective on air quality and lays out the challenges facing the South Coast Air Basin. The most significant air quality challenge in the Basin is to reduce an additional 45 percent reduction in nitrogen oxide (NO<sub>x</sub>) emissions in 2023 and an additional 55 percent reduction in NO<sub>x</sub> emissions beyond 2031 levels for ozone attainment.

As described in the 2016 AQMP, achieving NO<sub>x</sub> emission reductions in a timely manner is critical to attaining the National Ambient Air Quality Standard (NAAQS) for before the 2023 and 2031 deadlines. SCAQMD is committed to attain the ozone NAAQS as expeditiously as practicable, and SCAQMD staff believes that the proposed project plays an important in supporting SCAQMD's commitment. As such, SCAQMD staff recommends additional mitigation measures to further reduce air emissions, particularly from NO<sub>x</sub>. Please see the attachment for more information.

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 certification

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<sup>1</sup> Draft EIR. Section 5.2 – Air Quality. Page 5.2-17 and 18.

<sup>2</sup> South Coast Air Quality Management District. March 3, 2017. *2016 Air Quality Management Plan*. Available at: <http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan>.

of the Final EIR. Further, when the Lead Agency makes the finding that the recommended mitigation measures are infeasible, the Lead Agency shall describe the specific reasons for rejecting them in the Final EIR (CEQA Guidelines Section 15091).

SCAQMD staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Jack Cheng, Air Quality Specialist, CEQA IGR Section, at (909) 396-2448, if you have any questions regarding the enclosed comments.

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS:JC

RVC170425-10

Control Number

## ATTACHMENT

1. CEQA requires that all feasible mitigation measures and project design features that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate significant impacts. The Draft EIR included five air quality mitigation measures (MM AQ-1 through MM AQ-5). To further reduce the significant construction and operational air quality impacts, particular from NO<sub>x</sub>, SCAQMD staff recommends the following mitigation measures that the Lead Agency should include in the Final EIR. Additional information on potential mitigation measures as guidance to the Lead Agency are available on the SCAQMD CEQA Air Quality Handbook website<sup>3</sup>.

### **Construction Mitigation Measure**

2. Require the use of 2010 model year diesel haul trucks that conform to 2010 EPA truck standards or 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 haul trucks cannot be obtained, the Lead Agency shall use trucks that meet EPA 2007 model year NO<sub>x</sub> emissions requirements.

### **Operational Mitigation Measures**

3. In addition to the construction mitigation measure identified in Comment No. 2, the Lead Agency should incorporate the following mitigation measures to further reduce the proposed project's operational air quality impacts.
  - 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 light colored paving and roofing materials.
  - c) Install light colored "cool" roofs and cool pavements.
  - d) Improve walkability design and pedestrian network.
  - e) Increase transit accessibility and frequency by incorporating Bus Rapid Transit lines with permanent operational funding stream.
  - f) Limit parking supply and unbundle parking costs. Lower parking supply below ITE rates and separate parking costs from property costs.
  - g) Require use of electric lawn mowers and leaf blowers.
  - h) Require that 240-Volt electrical outlets or Level 2 chargers be installed in residential garages on-site that would enable charging of NEVs and/or battery powered vehicles.
  - i) Require at least 5% of all commercial vehicle parking spaces include EV charging stations. At a minimum, electrical panels should appropriately sized to allow for future expanded use.

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<sup>3</sup> South Coast Air Quality Management District. <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.

- j) Vehicles that can operate at least partially on electricity have the ability to substantially reduce the significant NO<sub>x</sub> 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. The cost of installing electrical charging equipment onsite is significantly cheaper if completed when the project is built compared to retrofitting an existing building. Therefore, 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.