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Review of the Draft Program Environmental Impact Report (Draft PEIR) for the Proposed Hemet Draft General Plan Update Project

The South Coast Air Quality Management District (AQMD) 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 Program Environmental Impact Report (final PEIR) as appropriate.

The AQMD staff is concerned about the potential cumulative health risk impacts to sensitive land uses (e.g., residential, hospital, school and park uses) from new industrial land uses identified in the proposed project. Therefore, the lead agency should revise the draft PEIR to address the project's potential cumulative health risk impacts and, if applicable, include mitigation measures that maintain the buffers specified by the CARB Air Quality and Land Use Handbook[1] for any new project. Further, the AQMD staff recommends that additional mitigation measures be considered to minimize the project's significant air quality and climate change impacts 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, AQMD staff requests that the lead agency provide the AQMD 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

[1] California Air Resources Board. April 2005. "Air Quality and Land Use Handbook: A Community Health Perspective." Accessed at:http://www.arb.ca.gov/ch/landuse.htm

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,

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

Attachment

IM:DG

RVC110930-04
Control Number

Potential Health Risk Impacts to Sensitive Land Uses

1. The AQMD staff is concerned about the potential health risk impacts to sensitive land uses from industrial sources in the proposed project. Specifically, the AQMD staff is concerned about the proposed land use plan (Exhibit 3-3) that depicts a variety of new industrial uses placed adjacent to residential uses between the SR-79 alignment corridor and Stetson Avenue. The lead agency provides a limited discussion on the potential impacts to sensitive land uses from industrial emissions sources on page 4.3-21 of the draft PEIR, but does not adequately address the potential cumulative impacts from future industrial emissions sources.

   Based on the lead agency's discussion for Impacts on Sensitive Receptors (page 4.3-20 in the draft PEIR), new stationary sources would present less than significant impacts as they will be subject to AQMD's permitting rules. However, this determination does not account for cumulative impacts from facility and area-wide emissions that will likely result from the proposed new industrial uses. As a result, the AQMD staff is concerned about the potential cumulative health risk impacts from toxic air pollutants emitted by the significant volume of industrial uses identified by the proposed project. Therefore, the lead agency should revise the draft PEIR to address the project's potential cumulative health risk impacts and, if applicable, include mitigation measures that maintain the buffers specified by the CARB Air Quality and Land Use Handbook for any new project.

Mitigation Measures for Construction Air Quality Impacts

2. Given that the lead agency concluded that the proposed project will have significant Construction related air quality impacts, the AQMD staff recommends that the lead agency provide additional mitigation pursuant to CEQA Guidelines §15126.4. Specifically, AQMD staff recommends that the lead agency minimize or eliminate significant adverse air quality impacts by adding the mitigation measures provided below.

   - Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow,
   - Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site,
   - Reroute construction trucks away from congested streets or sensitive receptor areas,
   - Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation,
   - Improve traffic flow by signal synchronization, and ensure that all vehicles and equipment will be properly tuned and maintained according to manufacturers' specifications,
   - Use coatings and solvents with a VOC content lower than that required under AQMD Rule 1113,

- Construct or build with materials that do not require painting,
- Require the use of pre-painted construction materials,
- Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export). 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 and PM emissions requirements,
- During project construction, all internal combustion engines/construction equipment operating on the project site shall meet EPA-Certified Tier 2 emissions standards, or higher according to the following:

  ✓ Project Start, to December 31, 2011: All offroad diesel-powered construction equipment greater than 50 hp shall meet Tier 2 offroad emissions standards. In addition, all construction equipment shall be outfitted with the 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 2 or Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

  ✓ January 1, 2012, 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 AQMD "SOON" funds. Incentives could be provided for those construction contractors who apply for AQMD "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.

Mitigation Measures for Operational Air Quality and Climate Change Impacts

3. The lead agency's operational air quality analysis demonstrates significant air quality and climate changes impacts from all criteria pollutant emissions (i.e., NOx, SOx, CO, VOC, PM10 and PM2.5) and greenhouse gas emissions. These impacts are primarily from mobile source emissions related to vehicle trips associated with the proposed project. However, the lead agency does not adequately address this large source of emissions. Specifically, the lead agency only requires a list of nominal non-quantifiable mitigation measures that are deferred to project level analyses. Therefore, the lead agency should reduce the project's significant air quality and climate change impacts by reviewing and incorporating additional transportation mitigation measures, such as those from the greenhouse gas quantification report published by the California Air Pollution Control Officer's Association in the final EIR[2].

[2] California Air Pollution Control Officer's Association. August 2010. Quantifying Greenhouse Gas Mitigation Measures. Accessed at: http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf