



South Coast Air Quality Management District

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Review of the Draft Environmental Impact Report (Draft EIR) for the Proposed Motte Lakeview Ranch Project

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document including with an extended review period. The AQMD did not receive a copy of the Draft EIR during the comment period. Pursuant to CEQA Guidelines 15086, lead agencies are required to consult with and request comments on an EIR from AQMD anytime a project may impact the resources over which we have authority (namely, air quality and greenhouse gases). AQMD staff has worked cooperatively with your agency in the past and looks forward to continuing to do so in the future. Please ensure that all future public notices for this project and others get forwarded to us at the address in the header above. The following comments are meant as guidance for the lead agency and should be incorporated into the Final Environmental Impact Report (Final EIR) as appropriate.

The AQMD staff is concerned about future local and regional significant air quality impacts and greenhouse gas (GHG) emissions impacts from the proposed project. Therefore, the AQMD staff recommends that the lead agency consider additional mitigation measures to minimize the project's significant regional air quality and GHG emissions 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

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

RVC120731-11
Control Number

Mitigation Measures for Operational Air Quality Impacts

1. The lead agency's operational air quality analysis demonstrates significant air quality impacts from all criteria pollutant emissions including NO_x, CO, VOC, PM₁₀, and PM_{2.5} emissions impacts. These impacts are primarily from mobile source emissions related to vehicle trips associated with the proposed project. As a result, the lead agency addresses the project's operational emissions by requiring a list of mitigation measures in the Draft EIR (i.e., Mitigation Measure 5.4-2). AQMD staff requests that further details be provided for how each of these measures will be implemented. For example, the lead agency requires that the project install EV charging facilities for a minimum of 5% of all parking spaces, however, the Draft EIR does not define the applicability of the measure (i.e., retail, residential, etc). As another example, it is not clear how the lead agency will implement measures such as telecommuting. The lead agency should provide the specific enforcement actions needed in the Final EIR in order to obtain the maximum air quality benefit and to describe at least a qualitative sense as to the effectiveness of the mitigation.

Mitigation Measures for Construction Air Quality Impacts

2. Given that the lead agency concluded that the proposed project will have significant construction related regional and localized air quality impacts from all criteria pollutant emissions including NO_x, CO, VOC, PM₁₀ and PM_{2.5}, the AQMD staff recommends that the lead agency further minimize or eliminate significant adverse air quality impacts by revising the third bullet of mitigation measure 5.4-1(b) as follows:
 - Restrict truck operations to "clean" trucks, such as the most currently compliant vehicles at the time of construction specifically, 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 NO_x and PM emissions requirements.

GHG Emission Reduction Mitigation Measures and BAU Assumptions

3. The Draft EIR states that the proposed project will have significant greenhouse gas emissions impacts; as a result, lead agency requires Mitigation Measure (MM) 5.4-3 to minimize these potential impacts. MM5.4-3 requires the proposed project to reduce GHG emissions by 7.5 percent (%) relative to the project's unmitigated emissions. However, this measure may not provide enforceable emission reductions that are necessary to minimize the project's impacts. Specifically, absent a project level GHG emission analysis that demonstrates each project's emissions, the plan area may not achieve the stated 7.5% reduction target. Therefore, the Final EIR should include a revision to MM 5.4-3 that requires a project level analysis that quantifies each subsequent project's GHG emission reduction. The lead agency should then implement a monitoring and reporting compliance plan that accounts for

any GHG emission reduction shortfalls from the project, in order to achieve the 7.5% reduction target for the plan.

Further, the lead agency states that the project has a “Business as Usual” (BAU) emissions baseline of 53,098 metric tons per year of CO₂, however, the Draft EIR lacks information on this baseline assumption. Therefore, the lead agency should substantiate the project’s impacts and the adequacy of the proposed GHG mitigation by providing sufficient data (i.e., land use assumptions and emission factors) to demonstrate the baseline emissions value (i.e., 53,098 metric tons/year of CO₂). Also, in light of a recent court ruling regarding BAU analyses¹ the lead agency should demonstrate that the BAU emissions analysis properly captures the project’s existing setting.

Regional Planning

4. The Draft EIR indicates that the proposed project is within the County of Riverside’s growth projections; however, lead agency does not provide any discussion on the project’s relationship to the recently adopted 2012 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Therefore, the AQMD staff recommends that the Final EIR describe if or how this project has been incorporated into this update, and if not, if the project would still be consistent with the 2012 RTP/SCS. Further, given the project’s existing setting in an undeveloped portion of the county the lead agency should provide discussion on how the project will contribute to achieving regional goals such as the SB 375 targets set forth in the 2012 RTP/SCS.

¹ Friends of the Northern San Jacinto Valley et al., v. County of Riverside et al. (Villages of Lakeview, April 2012)