



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

May 4, 2017

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Attention: Lorena A. Matarrita, Associate Planner
City of Loma Linda – Community Development Department
25541 Barton Road
Loma Linda, CA 92354

Draft Environmental Impact Report (Draft EIR) for the Proposed Citrus Trails Master Plan Project & Tract Map No. 18990 (SCH No.: 2016111070)

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

The Lead Agency proposes to develop a mixed-use community on 117.1 acres that would be divided into five distinctive districts and include 581 dwelling units, commercial, office, and retail uses. The project would also include areas for infrastructure, parks, open space, trails and recreation. The project would be built in three phases with Phase 1 beginning in approximately the third quarter of 2017, Phase 2 in late 2018, and Phase 3 in late 2021. An overlap between construction and operation is expected to occur after the completion of Phase 1. The buildout year is in 2023.

Air Quality Analysis

Based on the analyses, the Lead Agency found that the project's operational air emissions would exceed the SCAQMD's CEQA regional operation emission thresholds of significance for VOC and NO_x. Mitigation Measure (MM) 4.2-1 through MM 4.2-8 were proposed (see Page 4.2-31 and Page 4.2-32 of the Draft EIR). Implementation of mitigation measures would reduce emissions. However, the Lead Agency found that long-term NO_x emissions would remain above the SCAQMD's CEQA operation emission threshold during Phase 3 and Buildout operation, and that NO_x and VOC would remain above the SCAQMD's CEQA operation emission thresholds during the overlap between construction and operation. Therefore, these air impacts would be significant and unavoidable (see Page 4.2-32 of the Draft EIR).

SCAQMD's 2016 Air Quality Management Plan

Adopted on March 3, 2017, the 2016 Air Quality Management Plan (2016 AQMP) 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_x) emissions in 2023 and an additional 55 percent reduction in NO_x emissions beyond 2031 levels for ozone attainment. For more information on the 2016 AQMP, please visit the SCAQMD's website, at: <http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan>.

As described in the 2016 AQMP, to achieve NO_x emissions reductions in a timely manner is critical to attaining the National Ambient Air Quality Standard (NAAQS) for ozone before the 2023 and 2031 deadlines. SCAQMD is committed to attain the ozone NAAQS as expeditiously as practicable. The SCAQMD staff believes that the project plays a role in contributing to Basin-wide NO_x emissions.

Therefore, the SCAQMD staff recommends additional mitigation measures to further reduce air emissions. Please see the attachment for more information.

Pursuant to Public Resources Code Section 21092.5, the SCAQMD staff requests that the Lead Agency provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final EIR. Further, when the Lead Agency makes the finding that the additional mitigation measures as recommended in the attachment 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 Gordon Mize, Air Quality Specialist, CEQA IGR Section, at (909) 396-3302, 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

Attachment

LS:GM

SBC170426-02

Control Number

ATTACHMENT**Additional Mitigation Measures**

1. CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate these impacts. In addition to MM 4.2-1 through MM 4.2-8 on Pages 4.2-31 and 4.2-32 of the Draft EIR, the SCAQMD staff recommends that the Lead Agency incorporate the following mitigation measures in the Final EIR to further reduce NO_x and VOC emissions. Additional information on potential mitigation measures as guidance to the Lead Agency are available on the SCAQMD CEQA Air Quality Handbook website¹.

For Operational Air Quality Impacts (Area Sources)

- 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) Maximize the planting of trees in landscaping and parking lots.
- c) Use light colored paving and roofing materials.
- d) Utilize only Energy Star heating, cooling, and lighting devices, and appliances.
- e) Install light colored “cool” roofs and cool pavements.
- f) Limit the use of outdoor lighting to only that needed for safety and security purposes.
- g) Require use of electric or alternatively fueled sweepers with HEPA filters.
- h) Use of water-based or low VOC cleaning products.

For Operational Air Quality Impacts (Mobile Sources)

- i) Increase transit accessibility and frequency by incorporating Bus Rapid Transit lines with permanent operational funding stream.
- j) Limit parking supply and unbundle parking costs. Lower parking supply below ITE rates and separate parking costs from property costs.
- k) Require use of electric lawn mowers and leaf blowers.
- l) 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.
- m) 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.
- n) Vehicles that can operate at least partially on electricity have the ability to substantially reduce the significant NO_x 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

¹ South Coast Air Quality Management District. Available at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.

completed when the project is built compared to retrofitting an existing building. 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.