



South Coast Air Quality Management District

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SENT VIA USPS AND E-MAIL:

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Draft Environmental Impact Report (DEIR) for the French Valley Specific Plan No. 312 Project (DEIR No.: 551) (SCH No.: 2016081056)

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.

The proposed project would build 753 single-family residential dwelling units, a K-5 elementary school, parkland, open space, and ancillary amenities on a 221.5-acre site. In Section 4.3, *Air Quality*, the Lead Agency quantified the construction and operation impacts and compared them to the SCAQMD's air quality CEQA regional and localized significance thresholds. The Lead Agency found that the operational emissions would exceed the SCAQMD's regional significance thresholds for VOC and NOx. After incorporating the mitigation measures, the regional air quality impacts from operation would remain significant.

Additional Mitigation Measures

CEQA requires that all feasible mitigation measures that go beyond what is required by law to minimize any significant impacts. In addition to the mitigation measures proposed in the DEIR starting on page 4.3-32, the SCAQMD staff recommends that the Lead Agency include additional mitigation measures provided below in the Final EIR to further reduce the significant regional operational emissions for VOC and NOx.

1. Improve walkability design and pedestrian network.
2. Increase transit accessibility and frequency by incorporating bus transit lines with permanent operational funding stream.
3. 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. The cost of installing electrical charging equipment onsite is significantly cheaper if completed when the project is built compared to retrofitting an existing residence or a common electrical charging area. 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 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, residential electrical panels should appropriately-sized to allow for future expanded use.
4. Residential parking shall include community electric vehicle charging station(s).
5. Require use of electric lawn mowers and leaf blowers.
6. The developer(s) within the multifamily and single family developments shall provide outside electric outlets and natural gas stub outs.

Compliance with SCAQMD Rule 403(e) for Large Operations

The proposed project is a large operation on a 221.5-acre site (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 SCAQMD Rule 403(e) – Additional

Requirements for Large Operations¹. The requirements may include, but are not limited to, Large Operation Notification (Form 403 N), 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 class². The Final EIR should contain a discussion to demonstrate compliance with SCAQMD Rule 403(e).

Pursuant to Public Resources Code Section 21092.5, SCAQMD staff requests that the Lead Agency provide 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 IGR, at (909) 396-3302, if you have any questions regarding the enclosed comments.

Sincerely,



Lijin Sun, J.D.
Program Supervisor, CEQA IGR
Planning, Rule Development & Area Sources

LS:GM

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Control Number

¹ SCAQMD Rule 403. Last amended June 3, 2005. Available at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf?sfvrsn=4>.

² SCAQMD Compliance and Enforcement Staff Contact Information for Rule 403(e) Large Operations is (909) 396-2608 or by e-mail at dustcontrol@aqmd.gov.