South Coast
Air Quality Management District
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Draft Environmental Impact Report (Draft EIR) for the Proposed Special Planning Area "D" Specific Plan (the Groves at Loma Linda) and Phase Three Concept Area Development Project (SCH No.: 2018021064)

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.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to develop the Specific Plan Phase Three Concept Area to accommodate 481 residential units, 7.1 acres of commercial and office uses, and 26.5 acres of open space on 103 acres (Proposed Project). The Proposed Project is expected to be developed over time in three improvement districts with an expected buildout year of 2030[1].

SCAQMD Staff's Summary of the Air Quality Analysis

The Lead Agency quantified the Proposed Project's construction and operational emissions and compared them to SCAQMD regional and localized air quality CEQA significance thresholds. The Lead Agency also identified overlapping construction and operational activities and compared the combined emissions to SCAQMD regional air quality CEQA operational significance thresholds[2]. The Lead Agency found that the Proposed Project's construction emissions would be less than significant. However, the Proposed Project would result in significant and unavoidable air quality impacts for NOx emissions during operation after Mitigation Measures (MM) 4.2-1 through 4.2-8 are incorporated[3]. When the Proposed Project's construction activities overlap with the operational activities, NOx emissions would also be significant and unavoidable.

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)[4], which was later approved by the California Air Resources Board on March 23, 2017. Built upon the progress in implementing the 2007 and 2012 AQMPs, the 2016 AQMP provides a regional perspective on air quality and the challenges facing the South Coast Air Basin. The most significant air quality challenge in the Basin is to achieve an additional 45 percent reduction in nitrogen oxide (NOx) emissions in 2023 and an additional 55 percent NOx reduction beyond 2031 levels for ozone attainment.

General Comments

Achieving NOx 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 Proposed Project plays an important role in

[1] Draft EIR. Page 3-16.
[2] Draft EIR. Table 4.2-13. Page 4.2-25.
[3] Draft EIR. Table 4.2-12. Page 4.2-24.
[4] South Coast Air Quality Management District. March 3, 2017. *2016 Air Quality Management Plan*. Accessed at: http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan.

contributing to NOx emissions during operation. Therefore, SCAQMD staff has recommendations on additional mitigation measures to further reduce NOx emissions during the overlapping construction and operational activities. These mitigation measures are also capable of further reducing ROG and particulate matter emissions.

Closing

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), SCAQMD staff requests that the Lead Agency provide SCAQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful or useful to decision makers and to the public who are interested in the Proposed Project. Further, when the Lead Agency makes the finding that the recommended mitigation measures are not feasible, the Lead Agency should 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 me at lsun@aqmd.gov 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
RVC180406-05
Control Number

ATTACHMENT

Mitigation Measures

1. CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate significant adverse impacts. Because the Proposed Project would cause NOx emissions to exceed SCAQMD regional air quality CEQA significance threshold when construction activities overlap with operational activities, SCAQMD staff recommends that the Lead Agency incorporate the following mitigation measures in the Final EIR. These mitigation measures are capable of reducing NOx emissions during construction and should be implemented to reduce NOx emissions from overlapping construction and operational activities. Additional information on potential mitigation measures as guidance to the Lead Agency is available on the SCAQMD CEQA Air Quality Handbook website[5].

    a) 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) during construction, and if the Lead Agency determines that 2010 model year or newer diesel haul trucks are not feasible, the Lead Agency shall use trucks that meet EPA 2007 model year NOx emissions requirements, at a minimum. Include this requirement as a bid or contract specification with contractors. Require periodic reporting and provision of written documents by contractors to prove and ensure compliance.

    b) Require the use of off-road diesel-powered construction equipment that meets or exceeds the CARB and USEPA Tier 4 off-road emissions standards for equipment rated at 50 horsepower or greater during Project construction. Such equipment will be outfitted with Best Available Control Technology (BACT) devices including a CARB certified Level 3 Diesel Particulate Filters (DPF). Level 3 DPFs are capable of achieving at least 85 percent reduction in in particulate matter emissions[6]. A list of CARB verified DPFs are available on the CARB website[7]. These requirements shall be included in applicable bid documents and successful contractor(s) must demonstrate the ability to supply such equipment. A copy of each unit's certified tier specification or model year specification and CARB or SCAQMD operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment. In the event that construction equipment cannot meet the Tier 4 engine certification, the Project representative or contractor must demonstrate through future study with written findings supported by substantial evidence that is approved by the Lead Agency before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, reduction in the number and/or horsepower rating of construction equipment, limiting the number of daily construction haul truck trips to and from the Project, using cleaner vehicle fuel, and/or limiting the number of individual construction project phases occurring simultaneously.

    c) To further reduce VOC emissions from architectural coating, SCAQMD staff recommends that the Lead Agency require the use of architectural coatings (no more than 50 grams/liter of VOC) that are beyond the limits in SCAQMD Rule 1113 – Architectural Coatings[8], such as water-based or low VOC cleaning products.

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[5] South Coast Air Quality Management District. *CEQA Air Quality Handbook.* Accessed at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook.

[6] California Air Resources Board. November 16-17, 2004. *Diesel Off-Road Equipment Measure – Workshop*. Page 17. Accessed at: https://www.arb.ca.gov/msprog/ordiesel/presentations/nov16-04_workshop.pdf.

[7] *Ibid*. Page 18.

[8] South Coast Air Quality Management District. Rule 1113: Architectural Coatings. Accessed at: http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf.

d) Require that 240-Volt electrical outlets or Level 2 chargers be installed in parking lots that would enable charging of NEVs and/or battery powered vehicles.

Vehicles that can operate at least partially on electricity have the ability to substantially reduce the significant NOx and ROG impacts from the 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 be constructed with the appropriate infrastructure to facilitate sufficient electric charging for vehicles to plug-in.

2. Additionally, since operation of the Proposed Project would cause significant and unavoidable NOx emissions, SCAQMD staff recommends that the Lead Agency incorporate the following mitigation measures in the Final EIR in addition to MM 4.2-1 through MM 4.2-8.

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) Limit parking supply and unbundle parking costs.

c) Use light colored paving and roofing materials.

d) Require use of electric or alternatively fueled sweepers with HEPA filters.

e) Require use of electric lawn mowers and leaf blowers.

f) To ensure that the lowest emission technologies will be used throughout the project development spanning over the next 12 years ending in year 2030, SCAQMD staff recommends that the Lead Agency develop and implement a program-level, performance standards-based technology review that is generally appropriate for a long-range development project such as the Proposed Project. The deployment should include those technologies that are "capable of being accomplished in a successful manner within a reasonable period of time" (California Public Resources Code Section 21061.1), such as zero and near-zero emission technologies that are expected to be available in the life of the Proposed Project. Therefore, SCAQMD staff recommends that the Lead Agency conduct the technology review, develop performance standards for the review or other comparable strategies or tools to assess the availability of equipment and fleets with newer engine standards and model years, and implement the best available emissions control devices. Since technology is being developed and deployed at a rapid pace, the technology review should occur every two years. Alternatively, the Lead Agency should develop appropriate timeline (or schedule) for the technology review that supports the NOx emissions reductions goals and timeline in the 2016 AQMP. The information from the ongoing, biennial technology review will help identify the lowest emission technologies available. Subsequently, the Lead Agency should use this information to require the project-level development to implement these technologies either as mitigation measures or project design features to minimize construction and/or operational air quality impacts.

SCAQMD Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities

3. Since the Proposed Project would include demolition[9], asbestos may be encountered. As such, SCAQMD staff recommends that the Lead Agency include a discussion to demonstrate compliance with SCAQMD Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities[10] in the Final EIR.

[9] Draft EIR. Table 4.2-1. Page 4.2-2.

[10] South Coast Air Quality Management District. Rule 1403. Accessed at: http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1403.pdf.