



South Coast Air Quality Management District

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Revised Draft Environmental Impact Report (RDEIR) for the Proposed North District Development Plan (SCH No. 2018061044)

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 is proposing the phased construction of 1,635,000 square feet of student housing, containing 5,200 student beds, and approximately 210,000 square feet of associated facilities on 51 acres (Proposed Project). Phase one of the Proposed Project includes construction of 416 residential units, containing 1,502 student beds and 155,000 square feet of associated facilities. Phase one is expected to occur over 25 months and become operational in 2021¹. Construction of full buildout is expected to begin after 2022, as needed. Additionally, future phases will undergo independent environmental analysis, using project-level details unknown at this time, to determine their level of significance, and any resulting mitigation measures². The Proposed Project is located on the northwest corner of Canyon Crest Drive and West Linden Street in the City of Riverside.

SCAQMD Staff's Summary of Air Quality Analysis

In the Air Quality Analysis Section, the Lead Agency quantified the Proposed Project's construction and operational air quality emissions and compared those emissions to SCAQMD's regional and localized air quality CEQA significance thresholds. The Lead Agency found that the Proposed Project would result in less than significant regional and localized air quality impacts for criteria pollutants during construction, after the implementation of mitigation measure (MM) 4.3-1b and MM 4.3-1c^{3,4}. MM 4.3-1b requires construction contractors to employ the use of Tier 4 off-road diesel-powered construction equipment and/or best available control technology (BACT) retrofits that achieve Tier 3 emissions reductions at a minimum, where available⁵. Additionally, MM 4.3-1b requires construction contractors to limit onsite idling of heavy duty trucks to five minutes or less, minimize the traffic impacts resulting from the Proposed Project's construction, utilize low-NOx diesel fuel, and reroute haul trucks and/or construction equipment away from traffic congestion and sensitive receptors⁶. MM 4.3-1c requires construction contractors to use pre-painted materials, where available, and low VOC paints that comply with SCAQMD Rule 1113 at a minimum⁷. The Lead Agency also found that phase one of the Proposed Project would result in less than significant impacts

¹ RDEIR, Section 2, *Executive Summary*, Page 3.0-24.

² RDEIR, Section 2, *Executive Summary*, Page 2.0-1 and 2.0-2.

³ RDEIR, Section 4.2, *Air Quality*, Table 4.2-7, *Estimated Project Construction Emissions – Mitigated*, Page 4.2-25.

⁴ UCR's Long Range Development Plan (LRDP) Planning Strategies, Planning Principles, and Mitigation Measures have been incorporated by reference in Appendix 1.0.

⁵ RDEIR, Section 4.2, *Air Quality*, Page 4.2-23.

⁶ *Ibid.*

⁷ *Ibid.*

during operation for all criteria pollutants⁸, and full buildout would result in significant and unavoidable impacts for criteria pollutants NOx and VOCs⁹.

SCAQMD Staff’s Comments

Upon review of the RDEIR, SCAQMD staff found that the Lead Agency compared the Proposed Project’s operational emissions to SCAQMD’s regional thresholds for construction to determine that the Proposed Project’s operational air quality impacts would be less than significant (See Table 1 below). For example, the Lead Agency compared the operational NOx emissions to SCAQMD’s CEQA air quality significance threshold of 100 pounds per day (lbs/day) for construction instead of 55 lbs/day for operation. The Proposed Project’s operational VOC emissions were also compared to SCAQMD’s CEQA air quality significance threshold of 75 lbs/day for construction instead of 55 lbs/day for operation.

Figure 1: SCAQMD Staff’s Copy of Table 4.2-8, *Estimated Project Operational Emissions*

Table 4.2-8 Estimated Project Operational Emissions						
Construction Year	Maximum Emissions in Pounds per Day					
	VOC	NOx	CO	SOx	PM10	PM2.5
NDD Phase 1						
Maximum Daily Emissions	25	57	191	1	46	13
SCAQMD Regional Threshold	75	100	550	150	150	55
Exceeds Threshold?	No	No	No	No	No	No
Localized Project Emissions	13	<1	34	<1	<1	<1
SCAQMD Localized Threshold	N/A	270	1,577	N/A	4	2
Exceeds Threshold?	No	No	No	No	No	No
NDD Plan						
Maximum Daily Emissions	61	107	415	<1	119	33
SCAQMD Regional Threshold	75	100	550	150	150	55
Exceeds Threshold?	No	Yes	No	No	No	No
Localized Emissions	37	1	103	<1	1	1
SCAQMD Localized Threshold	N/A	270	1,577	N/A	4	2
Exceeds Threshold?	No	No	No	No	No	No
NDD Plan (Phase 1 + Remaining Phases)						
Maximum Daily Emissions	86	165	606	2	165	45
SCAQMD Regional Threshold	75	100	550	150	150	55
Exceeds Threshold?	Yes	Yes	Yes	No	Yes	No
Localized Emissions	50	2	138	<1	1	1
SCAQMD Localized Threshold	N/A	270	1,577	N/A	4	2
Exceeds Threshold?	No	No	No	No	No	No

Therefore, SCAQMD staff recommends that the Lead Agency revise the Air Quality Analysis in the Final EIR by comparing all operational emissions to SCAQMD’s regional CEQA significance thresholds for operation and revise the level of significance determination for any criteria pollutants that exceed their respective significance thresholds.

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)¹⁰, which was later approved by the California Air Resources Board on March 23, 2017. Built upon

⁸ *Ibid.* Table 4.2-8, *Estimated Project Operational Emissions*, Page 4.2-26.

⁹ *Ibid.*

the progress of 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 (Basin). The most significant air quality challenge in the Basin is to achieve an additional 45 percent reduction in nitrogen oxide (NO_x) emissions in 2023 and an additional 55 percent NO_x reduction beyond 2031 levels for ozone attainment.

As described in the 2016 AQMP, achieving 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 attaining the ozone NAAQS as expeditiously as practicable. If, upon revisions of the Air Quality Analysis, the Lead Agency finds that operation of phase one of the Proposed Project would result in significant air quality impacts, particularly NO_x emissions, feasible mitigation measures would be required pursuant to CEQA Guidelines Section 15126.4.

Recommended Mitigation Measures

SCAQMD staff has compiled a list of recommended mitigation measures as suggested resources and guidance to the Lead Agency to assist the identification of feasible mitigation measures for incorporation in the Final EIR to reduce emissions and minimize significant air quality impacts, particularly from NO_x and VOCs. Additional information on potential mitigation measures as guidance to the Lead Agency is available on the SCAQMD CEQA Air Quality Handbook website¹¹.

- a) Require that 240-Volt electrical outlets or Level 2 electric vehicle (EV) charging stations be installed in at least 5% of all vehicle parking spaces that would enable charging of EVs and/or battery powered vehicles. Vehicles that can operate at least partially on electricity have the ability to substantially reduce the significant NO_x and ROG 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 existing infrastructure. Therefore, SCAQMD staff recommends the Lead Agency require phase one, and all future phases of the North District Development Plan, to provide the appropriate infrastructure to facilitate sufficient electric charging for vehicles to plug-in. The Lead Agency should also include analyses to evaluate and identify sufficient power available for zero emission trucks and supportive infrastructures in the Energy and Utilities and Service Systems Sections of the Final EIR, where appropriate.
- b) Maximize use of solar energy including solar panels; installing the maximum possible number of solar energy arrays on the building roofs throughout the North District Development Plan Area to generate solar energy for each respective building facility.
- c) Provide incentives for employees working at the Proposed Project in order to encourage the use of public transportation or carpooling, such as discounted transit passes or carpool rebates.
- d) Implement a rideshare program for employees working at the Proposed Project and set a goal to achieve a certain participation rate over a period of time.
- e) Limit parking supply and unbundle parking costs.
- f) Require use of electric or alternatively fueled street-sweepers with HEPA filters.
- g) Require use of electric lawn mowers and leaf blowers.

¹⁰ 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>.

¹¹ South Coast Air Quality Management District. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.

- h) Maximize the planting of trees in landscaping and parking lots.
- i) Use light colored paving and roofing materials.
- j) Utilize only Energy Star heating, cooling, and lighting devices, and appliances.

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)). 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 Robert Dalbeck, Assistant Air Quality Specialist, CEQA- IGR Section, at RDalbeck@aqmd.gov, or (909) 396-2139 if you have any questions regarding the enclosed comments.

Sincerely,



Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

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