South Coast
Air Quality Management District
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FAXED: JUNE 14, 2005

June 14, 2005

Ms. Juanita W. Bullock
University of California Riverside
Capital and Physical Planning
3637 Canyon Crest Drive F-101
Riverside, CA 92507

Draft Environmental Impact Report (DEIR) for UCR 2005 Long Range Development Plan (April 2005)

Dear Ms. Bullock:

The South Coast Air Quality Management District (SCAQMD) 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 in the Final Environmental Impact Report.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Environmental Impact Report. The AQMD would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Charles Blankson, Ph.D., Air Quality Specialist – CEQA Section, at (909) 396-3304 if you have any questions regarding these comments.

Sincerely

Steve Smith, Ph.D.
Program Supervisor, CEQA Section
Planning, Rule Development & Area Sources

Attachment

SS:CB

RVC050426-03
Control Number

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Health Risk Analysis:

- The Health Risk Assessment Report (HRA) prepared by URS is included in Appendix D of the EIR. Page 4-2 of the HRA states that 125, 250 and 500-meter receptor grids were used to prepare the HRA. SCAQMD recommends that the peak annual concentrations should be identified using 100-meter receptor grid in the Final EIR.
- On pages 1-2 and 4-5, it appears from the text of the HRA, that a nine-year exposure period was used for on-campus and daycare child exposure. To provide a conservative analysis, the SCAQMD recommends a 70-year exposure period for all non-worker carcinogenic risk estimates. It is recommended that the Final EIR include carcinogenic risk based on a 70-year non-worker exposure period.
- The appendix of the HRA was provided by e-mail to SCAQMD. The source of the underground storage tank emission factor 0.018 pound/1,000 gallon is listed as the "General Instruction Book of the AQMD 2003-2004 Annual Emission Inventory Reporting Program." However, the emission factor on page 37 of the "General Instruction Book of the AQMD 2003-2004 Annual Emission Inventory Reporting Program" is reported as 1.8 pound/1,000 gallon. It is recommended that the Final EIR incorporate the emissions and risk based upon a correct emission factor.

CO Hotspots Analysis:

- Page 4.3-5 states that the CO hotspots analysis was prepared according to the CALINE4 screening procedure presented in the BAAQMD CEQA Guidelines. SCAQMD recommends that lead agencies complete the CO analysis based on full CALINE4 modeling. CALINE4 modeling should be prepared based upon the UC Davis Transportation Project-Level Carbon Monoxide Protocol (CO Protocol), revised December 1997 with EMFAC2002 emission factors. In addition, the BAAQMD Guidelines suggest that the full CALINE4 model be used for projects or plans that would generate 10,000 or more motor vehicle trips per day. Table 5-4 of the Traffic Study in Appendix H of the EIR presents 47,034 existing daily trips, 110,617 daily trips in 2015, which is a 53,582 increase in daily trips. The increase is five times greater than the 10,000 daily trip limit suggested by BAAQMD for its screening procedure. SCAQMD recommends that the Final EA include a CO hotspots analysis that uses the full CALINE4 model according to the CO Protocol with EMFAC2002 emission factors.
- The Simplified CALINE4 Carbon Monoxide Analysis worksheets in Appendix C of the EIR state that the emission factors were developed from the BAAQMD CEQA Guidelines 1996. The BAAQMD CEQA Guidelines 1996 recommends and presents URBEMIS7G emission factors for use with its simplified CO analysis. EPA approved EMFAC2002 as the only emission factor model for CO hotspots analyses in California on April 1, 2003 (Federal Register, Volume 68, Number 62, April 1, 2003). The grace period for using EMFAC7F ended June 30, 2003. Since the emission factors used for CO concentration estimation in the draft EIR are not approved by EPA, SCAQMD

recommends that the lead agency remodel CO concentration with EMFAC2002. EMFAC2002 can be downloaded from the Air Resources Board website at http://www.arb.ca.gov/ msei/on-road/latest_version.htm.

Construction and Operational Emissions Data:

- The footnotes to Tables 4.3-2 through 4.3-6 indicate that the calculation data for the project emissions are provided in Appendix C. The lead agency used URBEMIS 2002 to estimate project emissions but the model printout showing the assumptions and the input and output data is not included in Appendix C. Appendix C shows only the CALINE 4 output. The URBEMIS 2002 printout was sent to SCAQMD staff on request. The URBEMIS 2002 output files should have been included in the DEIR to provide the reviewing public with the data needed to fully review the project's air quality impacts.
- Demolition Emissions: The proposed project involves the demolition of some structures on campus. For example, on page 3-21 of the DEIR, the lead agency describes the provision of new parking facilities at the corner of Canyon Crest Drive and Blaine Street which currently holds a portion of the Family Student Housing Complex. The construction of the parking facilities would involve the demolition of these housing units. Table 2-1 on page 2-10 (Land Use 5) also describes the removal of existing family housing units on the East campus and providing replacement and additional units of family housing on the West Campus. The URBEMIS 2002 printout and the tables in Section 4.3 do not appear to include emissions from these demolition activities. Please revise the URBEMIS 2002 model input data to reflect the demolition activities and the corresponding emissions.
- Construction Emissions: The analysis of construction air quality impacts was difficult to evaluate because very little information was provided in the text regarding assumptions used to analyze impacts. For example, it appears that the analysis assumed that approximately ten percent of the total building construction would occur each year between 2005 and 2015 because the construction analysis is only for the year 2005 and the square feet shown is 417,919, approximately ten percent of the total. First, more detail needs to be provided on the construction analysis so it is easier to review and evaluate. Second, if the lead agency's construction analysis does assume ten percent of the total construction occurs each year, there is nothing evident in the document that actually limits annual construction. If construction exceeds ten percent in any one year, then additional air quality impacts will occur in that year. Similarly, the URBEMIS output for existing setting construction (year 2003) shows no phase 2 site grading emissions. It is unclear how construction is occurring without some kind of site preparation occurring. Please explain why the construction phase 2 is turned off or rerun the model with the construction phase 2 activated.