



South Coast Air Quality Management District

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June 21, 2005

Mr. Larry Ross
County of Riverside
Planning Department
39493 Los Alamos Road, Suite A
Murrieta, CA 92563

**Draft Environmental Impact Report (DEIR) No. 00458,
TT No. 31194, CZ No. 06764, GPA No. 00729
(Woodside Homes, May 2005)**

Dear Mr. Ross:

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 SCAQMD 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

RVC050510-02
Control Number

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1. **NO_x Construction Emissions:** Table 4-13 on page 4-133 of the DEIR shows that NO_x and PM10 construction emissions will be significant. However, the lead agency states on page 4-133 that “the mobile nature of the on-site construction equipment and the off-site trucks will prevent any microscale violation of the NO_x or other standards.” The SCAQMD disagrees with this statement because construction equipment, although mobile, remain at a fixed location and, therefore, could create localized air quality impacts. Off-site trucks could contribute to localized air quality impacts when they enter the construction site and idle while making a pick-up or delivery. Guidance for performing a localized air quality analysis for the proposed project’s construction emissions can be found at the following SCAQMD web site: http://www.aqmd.gov/ceqa/handbook/LST/Method_Final.pdf. Otherwise, the lead agency should delete the statement about localized air quality impacts.
2. **Reducing NO_x Emissions:** On page 4-137 of the DEIR the lead agency concludes that PM10, NO_x and VOC emissions during construction can be reduced to below levels of significance with implementation of mitigation measures. Although the lead agency has provided some mitigation measures to address significant construction air quality impacts, the control efficiencies of the mitigation measures have not been provided or applied to the construction air quality impacts. For example, Table 4-13 shows NO_x construction emissions during grading to be 386 pounds per day. The NO_x mitigation measure, mandatory program of low emissions tune-ups, only provides a five percent control efficiency at most. Implementing this mitigation measure reduces NO_x emissions by approximately 19.3 pounds per day. Remaining NO_x emissions from construction equipment of 366.7 pounds per day still exceed by a substantial margin the recommended NO_x construction significance threshold of 100 pounds per day. Consequently, the lead agency has not demonstrated that construction emissions will be less than significant.
3. **Reducing VOC Emissions:** Similarly, the mitigation measure to reduce VOC impacts from architectural coatings, limit coating use to 100 gallons per day, does not reduce emissions to less than 75 pounds per day. In addition, the lead agency does not consider VOC emissions from other sources, e.g., construction emissions from construction worker commute trips, etc. To ensure that VOC emissions from architectural coatings do not exceed the relevant significance threshold, the lead agency should further restrict the number of gallons of coatings used per day and consider requiring the use of coatings with a VOC content limit less than 100 grams per liter.
4. **Operational Emissions:** On page 4-137 of the DEIR, the lead agency concludes that only operational CO emissions from mobile sources would be significant for the proposed project. This result appears to be based on running the URBEMIS 2002 model for the years 2015, 2020, and 2025. Because emissions from future vehicle fleets are expected to be lower than emissions from existing fleets, future mobile source emissions do not contribute to significant operational air quality impacts. However, the URBEMIS

2002 run for the year 2005 shows that VOC, NO_x, and CO emissions for the proposed project exceed the applicable operational significance thresholds. The model run for the year 2010 shows that VOC emissions exceed the applicable operational significance threshold. Significance for the proposed project should be based on peak emissions, i.e., year 2005 emissions instead of later non-peak years. Consequently, the proposed project is significant for operational VOC, NO_x, and CO emissions.

5. **Project Mitigation:** In addition to the mitigation measures identified on page 4-137, SCAQMD staff recommends the following mitigation measures for consideration by the lead agency:
 - Use electric- or natural gas-powered equipment in lieu of gasoline or diesel-powered engines. However, where diesel equipment has to be used because there are no practical alternatives, the construction contractor should use particulate filters, oxidation catalysts and low sulfur diesel, as defined in SCAQMD Rule 431.2, i.e., diesel with less than 15 ppm sulfur content.
 - Use electricity from power poles instead of temporary diesel- or gasoline-powered generators.
 - Use light-colored roofing materials in construction to deflect heat away from buildings thus reducing energy consumption.
 - Use double-paned windows to reduce thermal loss in buildings.
 - Install automatic lighting on/off controls and energy-efficient lighting.
 - Landscape with appropriate drought-tolerant species to reduce water consumption.

6. **CO Hotspots Analysis:** The lead agency states on page 4-134 of the DEIR that a screening procedure based upon the California roadway dispersion model CALINE4 was used to determine whether there is a potential for the creation of hotspots at any of the roadway intersections close to the proposed project site. Based on the results of this screening analysis shown in Table 4-15 on page 4-136, the lead agency determined that the project would not generate any adverse microscale air quality impacts. The lead agency did not provide any information in the DEIR on this screening procedure. SCAQMD staff requested information on the screening procedure, but it was not provided. As a result, SCAQMD staff was unable to validate the results of the screening analysis. .

7. **URBEMIS Model Run:** The footnote to Table 4-14 on page 4-135 of the DEIR should be corrected to URBEMIS 2002 Air Quality Model.

8. **Project Size:** There appears to be a discrepancy regarding the number of single-family housing units that are proposed for construction. Page 1-7 of the DEIR describes 486 dwelling units and page 4-132 describes 492 dwelling units.