



South Coast Air Quality Management District

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FAXED: MARCH 18, 2005

March 18, 2005

Mr. Andrew Huneck
County of Riverside Planning Department
4080 Lemon Street, 9th Floor
Riverside, CA 92502-1409

Dear Mr. Huneck:

**Draft Environmental Impact Report (DEIR) No. 00457 for Tentative Tract No. 30433 and
Change of Zone No. 06656:
County of Riverside**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The SCAQMD would also like to thank the lead agency for allowing additional time to submit comments. 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

RVCO50202-04
Control Number

**Draft Environmental Impact Report (DEIR) No. 00457 for
Tentative Tract No. 30433 and Change of Zone No. 06656:
County of Riverside**

1. **PM10 Emission Factor:** On page 4-176 of the DEIR, the lead agency states that according to the SCAQMD 1993 CEQA Air Quality Handbook (SCAQMD Handbook, Table 9-2) site grading generates 150 pounds of PM10 per day per acre in the absence of any dust control measures. This appears to be a typographical error as the correct factor is 55 pounds per day per acre. Please correct this in the Final EIR.
2. **Table 4-19 - Project Operation:** It is not clear what the purpose of this table is. The text in the DEIR cites Table 4-19 as including operational emissions from the project. While the table purports to show emissions for project operation, as the title indicates, the rows are labeled "Project Construction" for both Summer and Winter and compares these emissions with the operational significance thresholds for the criteria pollutants. Review of the URBEMIS 2002 output sheets in Appendix H shows that the correct project operation emissions are shown in Table 4-18. Further, the emissions results in Table 4-19 are not consistent with the results in URBEMIS 2002 output sheets. To facilitate review of the emission results, it is recommended that the lead agency present two separate emission tables, one showing construction emissions and the other showing operational emissions. The emissions in the two tables should be compared to their respective significance thresholds and the appropriate conclusions drawn with regards to whether or not project emissions are significant.
3. **Editorial Comments:** On page 4-177 of the DEIR it is stated that URBEMIS 2001 was used to evaluate the emissions impact of the project traffic. As pointed out above, Technical Appendix H, which is referenced by the lead agency, shows that URBEMIS 2002 and not URBEMIS 2001 model was used to analyze the project's construction and operational impacts. Please correct this in the FEIR. Further, page 4-176 in the DEIR states that the project site occupies approximately 188.1 acres. Page 3-7 in Appendix H shows a total project site of 160 acres. The two are not consistent. Please provide the correct acreage in the FEIR.
4. **CO Hot Spots Analysis I:** The lead agency performed the CO "Hot Spots" analysis using the "CO Protocol" prepared by the University of California, Davis [December 1997] (1997 CO Protocol). The SCAQMD 1993 CEQA Air Quality Handbook (Handbook) requires the use of either the US EPA CAL3QHC or the US EPA CALINE model to estimate the CO concentrations in the CO "Hot Spots" analysis. However, the 1997 CO Protocol is based on CALINE4 model. The lead agency presents the CO impacts in Tables 3-5, 3-7, 3-9, 3-11 and 3-13 in Appendix H. The detailed procedures used to estimate the CO concentrations were not provided

for SCAQMD review. In the absence of this information, the SCAQMD is unable to confirm the results of the analysis.

5. **CO Hot Spots Analysis II:** The lead agency addressed the 1-hour CO concentrations from the proposed project's CO emissions. The lead agency needs to address the proposed project's 8-hour average CO concentrations.