



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL AND USPS:

October 13, 2017

ddarnell@riversideca.gov

Doug Darnell, Senior Planner
City of Riverside
3900 Main Street, Third Floor
Riverside, CA 92522

Draft Environmental Impact Report (Draft EIR) (No. 2017041039) for the Proposed 2014-2021 Housing Element Update (“Proposed Project”)

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 and Air Quality Analysis

The Lead Agency proposes 69 candidate sites for rezoning comprising 395 acres. In the Air Quality Section, the Lead Agency quantified the Proposed Project’s construction and operational emissions and compared those emissions to SCAQMD’s regional and localized air quality CEQA significance thresholds to determine the significance of air quality impacts. Based on the analyses, the Lead Agency found that the Proposed Project’s construction and operational air quality impacts would be significant and unavoidable after mitigation¹.

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), which was later approved by the California Air Resources Board of Directors on March 23rd. The 2016 AQMP² is a regional blueprint for achieving air quality standards and healthful air in the South Coast Air Basin. Built upon the progress in implementing the 2007 and 2012 AQMPs, the 2016 AQMP provides a regional perspective on air quality and lays out the challenges facing the South Coast Air Basin. The most significant air quality challenge in the Basin is to reduce an additional 45 percent reduction in nitrogen oxide (NOx) emissions in 2023 and an additional 55 percent reduction in NOx emissions beyond 2031 levels for ozone attainment.

Achieving NOx emission reductions in a timely manner is critical to attaining the National Ambient Air Quality Standard (NAAQS) for before the 2023 and 2031 deadlines. SCAQMD is committed to attain the ozone NAAQS as expeditiously as practicable, and the Proposed Project plays an important role in supporting SCAQMD’s commitment. As such, SCAQMD staff recommends additional mitigation measures to further reduce emissions, particularly NOx emissions. Please see the attachment for more information.

Pursuant to Public Resources Code Section 21092.5, SCAQMD staff requests that the Lead Agency provide SCAQMD with written responses to all comments contained herein prior to the certification of the Final EIR. Further, when the Lead Agency makes the finding that the recommended mitigation

¹ Draft EIR. Section ES.5

² South Coast Air Quality Management District. March 3, 2017. *2016 Air Quality Management Plan*. Available at: <http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan>.

measures are infeasible, the Lead Agency shall 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 Jack Cheng, Air Quality Specialist, CEQA IGR Section, at (909) 396-2448, 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:JC

RVC170901-27

Control Number

ATTACHMENT

Additional Mitigation Measures to Further Reduce Construction and Operational Emissions

1. CEQA requires that all feasible mitigation measures go beyond what is required by law to minimize any significant impacts. To further reduce the significant construction and operational emissions, particular from NO_x and VOCs, SCAQMD staff recommends the following mitigation measures that the Lead Agency should include in the Final EIR. Additional information on potential mitigation measures as guidance to the Lead Agency is available on the SCAQMD CEQA Air Quality Handbook website³.

Construction Mitigation Measures

2. Construction projects shall require construction equipment to meet Tier 4 CARB/U.S. EPA standards. All off-road diesel-powered construction equipment shall meet or exceed Tier 4 off-road emissions standards. A copy of the fleet's tier compliance documentation, and CARB or AQMD operating permit shall be provided to the Lead Agency at the time of mobilization of each applicable unit of equipment. In the event that all construction equipment cannot meet the Tier 4 engine certification, the applicant 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 measures 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 Proposed Project, using cleaner vehicle fuel, and/or limiting the number of individual construction project phases occurring simultaneously.
3. 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), and if the Lead Agency determines that 2010 model year or newer diesel haul trucks cannot be obtained, the Lead Agency shall use trucks that meet EPA 2007 model year NO_x emissions requirements, at a minimum.

Operational Mitigation Measures

4. The Lead Agency should incorporate the following mitigation measures to further reduce the Proposed Project's significant operational air quality impacts.
 - a) Limit parking supply and unbundle parking costs. Lower parking supply below the Institute of Transportation Engineers (ITE) rates and separate parking costs from property costs.
 - b) Require use of electric lawn mowers and leaf blowers.
 - c) Require that 240-Volt electrical outlets or Level 2 chargers be installed in residential garages onsite that would enable charging of NEVs and/or battery powered vehicles.
 - d) Require at least 5% of all commercial vehicle parking spaces include EV charging stations. At a minimum, electrical panels should appropriately sized to allow for future expanded use.
 - e) Vehicles that can operate at least partially on electricity have the ability to substantially reduce the significant NO_x 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 an existing building. Therefore,

³ South Coast Air Quality Management District. <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.

SCAQMD staff recommends the Lead Agency require the Proposed Project to be constructed with the appropriate infrastructure to facilitate sufficient electric charging for vehicles to plug-in. For residences, SCAQMD staff recommends that homes be appropriately wired from the electrical panel to later allow residents to install electrical chargers, if desired. At a minimum, residential electrical panels should appropriately-sized to allow for future expanded use.