



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Draft Environmental Impact Report (Draft EIR) for the Proposed Roquet Ranch Specific Plan (SCH: 2016061056)

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'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 AQMP¹ is a regional blueprint for achieving air quality standards and healthful air in the South Coast Air Basin (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 Basin. The most significant air quality challenge in the Basin is to reduce an additional 45 percent reduction in NO_x emissions in 2023 and an additional 55 percent reduction in NO_x emissions beyond 2031 levels for ozone attainment.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to construct 874 residential units, a 10.3-acre school, a 0.8-acre fire station, 1.2 acres of commercial uses, 219 acres of open space, and 16.5 acres of roadways on 336.2 acres (Proposed Project). Based on a review of aerial photographs, SCAQMD staff found that the Proposed Project would locate residential land uses less than 300 feet away from Interstate 215. Construction is expected to begin in 2017 and be completed in late 2020. Construction and operational activities are expected to overlap.

SCAQMD Staff's Summary of Air Quality and Health Risk Assessment (HRA) Analyses

In the Air Quality Section, the Lead Agency quantified the construction and operational emissions and compared them to SCAQMD's regional and localized air quality CEQA significance thresholds to determine the significance of air quality impacts. The Lead Agency found that after incorporating mitigation measure (MM) 4.2-1, the Proposed Project would exceed SCAQMD's regional air quality CEQA significance thresholds for VOC, NO_x, and CO

¹ 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>.

when the construction phase overlaps with operational activities². The Lead Agency performed a HRA and found that the Maximum Exposed Individual Resident cancer risk would be 6.44 in one million which is below SCAQMD's CEQA significance threshold of 10 in one million for cancer risk³.

General Comments

SCAQMD staff has concerns about the HRA analysis in the Draft EIR. The HRA analysis used assumptions which have likely led to an under-estimation of the Proposed Project's health risk impacts. Details are included in the attachment. As described in the 2016 AQMP, achieving NOx emission 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 attain the ozone NAAQS as expeditiously as practicable. Therefore, SCAQMD staff recommends changes to the existing MM 4.2-1 and a new mitigation measure to further reduce significant NOx emissions during the overlapping construction and operational phases. Please see the attachment for more information.

Pursuant to the California Public Resources Code Section 21092.5 and CEQA Guidelines Section 15088, 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. SCAQMD staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Ryan Bañuelos, Air Quality Specialist, CEQA Section, at (909) 396-3479, if you have any questions on the comment.

Sincerely,



Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS:JC:RB

SBC170808-02

Control Number

² Draft EIR. Appendix B, *Roquet Ranch Specific Plan Air Quality Impact Analysis*. The Lead Agency stated that "it is impossible to determine which portions of the Project site would be operational while other portions of the Project site would be under construction. Therefore, the Air Quality Impact Analysis included a conservative evaluation of a worst-case scenario that models air quality impacts of the Project if the construction and operational phases were to fully overlap. In reality, the overlap scenario modeled by the Project's Air Quality Impact Analysis would not occur, as it assumes the Project would be fully operational during construction activities. Thus, the analysis is conservative and overstates the Project's air quality impacts."

³ Draft EIR. Appendix C, *Roquet Ranch Specific Plan Air Toxic and Criteria Pollutant Health Risk Assessment*. Table 5-1.

ATTACHMENT

Health Risk Assessment (HRA) Analysis

1. In the HRA, the Lead Agency used the mean breathing rates to calculate a weighted average breathing rate. Consistent with SCAQMD's Risk Assessment Procedures⁴, SCAQMD staff recommends that the Lead Agency use the 95th percentile breathing rates and the other parameters such as fraction of time at home, exposure frequency, and age specific factor for each corresponding age bin (i.e. emissions from Year 1 of project operation should be used to estimate cancer risks to the third trimester to 0 year age bin; Year 1 and 2 of project operation should be used to estimate the cancer risks to the 0 to 2 years age bins; and so on)..

Mitigation Measures

2. CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant impacts. To further reduce the significant NOx emissions during the overlapping phases, SCAQMD staff recommends the following changes to MM 4.2-1 and a new mitigation measure (MM) 4.2-2 that the Lead Agency should include in the Final EIR. For more information on potential mitigation measures as guidance to the Lead Agency, please visit SCAQMD's CEQA Air Quality Handbook website⁵.

Recommended Changes to the Existing Mitigation Measure (MM) 4.2-1

MM 4.2-1: Prior to issuance of grading permits, the City of Colton Building Official or his/her designee shall ensure that grading plans include a note that specifies that that all construction equipment greater than 150 horsepower is California Air Resources Board (CARB) Tier 34 Certified ~~or better~~. The Grading Contractor shall be responsible for ensuring compliance with this note throughout the duration of grading activities.

Recommended New Mitigation Measure (MM) 4.2-2

MM 4.2-2: 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 NOx emissions requirements, at a minimum. Additionally, consider other measures such as incentives, phase-in schedules for clean trucks, etc. during the construction period.

⁴ South Coast Air Quality Management District. August 8, 2017. Accessed at: http://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1401/riskassessmentprocedures_2017_080717.pdf?sfvrsn=4.

⁵ South Coast Air Quality Management District. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa>.

Compliance with SCAQMD Rule 403(e) – Large Operations

3. The Proposed Project is a large operation on 336.2 acres (50 acres or more of disturbed surface area; or daily earth-moving operations of 3,850 cubic yards or more on three days in any year) in the South Coast Air Basin. The Lead Agency is required to comply with SCAQMD Rule 403(e) – Additional Requirements for Large Operations⁶. The requirements may include, but are not limited to, Large Operation Notification (Form 403 N), appropriate signage, additional dust control measures, and employment of a dust control supervisor that has successfully completed the Dust Control in the South Coast Air Basin training class⁷. Therefore, SCAQMD recommends that the Lead Agency include a discussion to demonstrate compliance with SCAQMD Rule 403(e) in the Final EIR.

⁶ South Coast Air Quality Management District. Rule 403. Last amended June 3, 2005. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf?sfvrsn=4>

⁷ South Coast Air Quality Management District. Compliance and Enforcement Staff's contact information for Rule 403(e) Large Operations is (909) 396-2608 or by e-mail at dustcontrol@aqmd.gov.