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FAXED: April 28, 2009 April 28, 2009

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Review of the Draft Environmental Impact Report (Draft EIR) for The Villages of Lakeview Specific Plan No. 342, Change of Zone No. 07055, General Plan Amendment No. 720 &721

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 into either a Revised Draft or Final Environmental Impact Report (Final EIR) as appropriate.

The SCAQMD staff appreciates the fact that the lead agency allowed additional time in which to submit comments. Further, staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,

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

Attachment

SN:DG

RVC090219-02
Control Number

Air Quality Analysis:

1. On page 5.3-46 of the Draft EIR the lead agency states that since the estimated maximum daily emissions summed in Table 5.3-D, "involve both construction and operational emissions, it is not known which SCAQMD threshold would apply." In the case of overlapping construction and operation emissions, both within a phase and between phases, the results should be compared to the applicable regional operational significance threshold. SCAQMD staff understands that applying the applicable operational regional significance thresholds to the analysis results will not modify the lead agency's significance determination. For clarification the lead agency may wish to revise tables 5.3-D and 5.3-E in the Final EIR to include the applicable significance thresholds.

2. The Desert Research Institute (DRI) PM10 equation was used for the estimation of concentrations for the PM10 localized significance threshold, which is permissible. PM2.5 concentrations were estimated from the PM10 concentrations by assuming that 21 percent of the PM10 is PM2.5. This is generally true for fugitive dust from construction; however, the PM10 concentrations were derived using a number of PM10 sources (i.e., construction equipment exhaust and fugitive dust). The PM2.5 fraction default of PM10 emitted by off-road diesel construction equipment exhaust is 92 percent. In addition, the DRI PM10 equation was developed for fugitive dust from roadways. Based on sensitivity analysis, fugitive dust influences PM10 concentrations, while combustion emissions heavily influence PM2.5 concentrations. Therefore, SCAQMD staff does not recommend using the DRI PM10 equation for PM2.5. SCAQMD staff recommends that the lead agency use PM2.5 concentrations directly modeled by ISCST3, rather than estimating PM2.5 concentrations from post-processed PM10 concentrations in the Final EIR.

3. The PM10 emission factor for construction emissions is based on disturbing an area of 20 acres per day (80,937 square meters). However, the dimensions of the area source are 300 meters by 270 meters (60,000 square meters). The emission rate for an area source is mass per second per area (g/(s-m2)). Since the emissions rate was estimated using a larger area than the dimensions of the area source modeled, the PM10 concentration estimated is underestimated. SCAQMD staff request that the PM10 concentration be corrected in the Final EIR by multiplying the PM10 concentration in the Draft EIR by the ratio 1.35 (80,937 m2/60,000 m2). Alternatively, the lead agency could add a mitigation measure restricting the area disturbed to 60,000 square meters per day (approximately 14 acres per day).

4. The spreadsheet TVOL Appendix B LST emission factors provide information on the development of emission rates used in ISCST3 from emissions estimated by URBEMIS. When these daily emissions are compared to Table 4 of the air quality analysis, it appears that the concentrations in the LST analysis were developed from single construction activity (grading). Table 4 shows that in Phase I site grading and soil movement overlap and in Phase II demolition and site grading overlap. Therefore, it appears that the emission rates used in the LST analysis were

underestimated (i.e., did not include emissions from soil movement in Phase I or demolition in Phase II. Peak daily emissions should be evaluated in the LST analysis in the Final EIR.

Health Risk Assessment:

Health Risk Assessment – Ramona Expressway

5. The reference on the spreadsheet Ramona Expressway HRA Truck Emission Factors for truck volumes from the County of Riverside is presented as http://www.rivcoph.org/indhyg/traffic.htm. The reference on the spreadsheet Ramona Expressway HRA Truck Emission Factors for truck volumes from Caltrans is presented as www.dot.ca.gov/hq/traffops/saferesr/trafdata/index.htm for 2005. Both references were reviewed by SCAQMD staff. The link segments listed (e.g., west of Reservoir Ave, Reservoir Ave to Hansen Ave, etc.) were not identified in these sources. The development of the truck volumes should be further clarified in the Final EIR.

Health Risk Assessment Nutrilite Facility

6. A deposition velocity of 0.05 meter per second was used. SCAQMD recommends that a deposition velocity of 0.02 meter per second be used.

Mitigation Measures

Construction

7. In addition to the air quality mitigation measures (MM Air 1 through MM Air 12) proposed on page 5.3-88 and 5.3-89 of the Draft EIR the SCAQMD recommends that the lead agency consider adding the following mitigation measures to further reduce air quality impacts from the construction phase of the project, if feasible:

   NOx:

   - Require or provide additional points for contractor proposals that demonstrate early compliance for off-road equipment with the California Air Resources Board's (CARB) in-use off-road diesel vehicle regulation and SCAQMD Rule 2449,
   - Require or provide additional points for contractor proposals that include off-road construction equipment that meets or exceeds Tier 3 standards with available CARB verified or EPA certified technologies,
   - Require the use of alternative fueled off-road construction equipment,

In addition to the above NOx measures, SCAQMD staff recommends modifying the following existing mitigation measure as follows.

MM Air 3: To reduce construction vehicle (truck) idling while waiting to enter/exit the site, prior to issuance of grading permits, the contractor shall submit a traffic control plan that:

- Will describe in detail safe detours to prevent traffic congestion to the best of the project's ability,
- Provides temporary traffic control measures during construction activities that will allow both construction and on-street traffic to move with less than 5-minute idling times,
- Require construction parking to be configured such that traffic interference is minimized,
- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site,
- Schedule construction activities that affect traffic flow on the arterial system to off-peak hours to the extent practicable,
- Reroute construction trucks away from congested streets or sensitive receptor areas, and
- Improve traffic flow by signal synchronization.

For additional measures to reduce off-road construction equipment, refer to the mitigation measure tables located at the following website: www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html.

Fugitive Dust:

- Require the application of non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more),
- Require all trucks hauling dirt, sand, soil, or other loose materials to be covered,
- Suspend all excavating and grading operations when wind gusts (as instantaneous gusts) exceed 25 mph,
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation,
- When sweeping streets to remove visible soil materials use SCAQMD Rule 1186 and 1186.1 certified street sweepers or roadway washing trucks,
- Pave road and road shoulders, and
- Replace ground cover in disturbed areas as quickly as possible.

VOC

- Use coatings and solvents with a VOC content lower than that required under SCAQMD Rule 1113,
- Construct or build with materials that do not require painting, and
- Require the use of pre-painted construction materials.

Operation

8. According to Figure 5.9-3 most of the land uses surrounding the proposed project are zoned as agriculture, residential, rural mountainous, commercial retail, and light industrial. Since the proposed project is largely residential, open space, and some commercial, to protect sensitive receptors, including residents, from potential adjacent future projects that may include heavy industry or facilities that attract heavy-duty diesel trucks, SCAQMD staff requests that the lead agency include a mitigation measure that would prohibit heavy industrial facilities or facilities that attract heavy-duty diesel trucks from locating within 1,000 feet from the project boundaries.