South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

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Mr. Jon McMains, Director jmcmains@yucaipa.org
Community Development Department
City of Yucaipa
34272 Yucaipa Boulevard
Yucaipa, CA 92123

Draft Program Environmental Impact Report (Draft PEIR) for the Proposed Robinson Ranch Planned Development (SCH No. 2007111104)

The South Coast Air Quality Management District (AQMD) 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 CEQA document. In the project description, the lead agency proposes a 522 acre planned development that would include approximately 4,159 residences, 1.32 million square feet of general commercial uses, and 369,992 square feet of business park uses.

The AQMD is concerned that the proposed project includes the possibility of residential land uses being constructed near the Interstate (I-10) Freeway, a high volume freeway that experiences 103,000 daily trips at this location. The proposed project also includes residential uses, specifically in the West Oak Center Planning Area, located next to a proposed business park that could generate potentially significant diesel particulate emissions from trucks operating at the site. The AQMD requests that for future projects tiering off this PEIR that the lead agency commit to quantifying potential health risks and implementing all feasible mitigation measures to minimize the impacts to the proposed residences located within 500 feet from the freeway and from diesel fueled truck routes serving the proposed business park. The AQMD also requests that the lead agency quantify localized operational emission impacts for future projects when project specific information is available. The lead agency has also determined that construction and operational air quality impacts exceed the AQMD recommended regional daily thresholds of significance. The AQMD staff therefore recommends that all feasible mitigation measures be incorporated to reduce the significant impacts from those sources. Finally, in the FEIR, the lead agency should provide additional justification to support the analysis and mitigation of GHG emissions.

Pursuant to Public Resources Code Section 21092.5, please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final Environmental Impact Report. The AQMD staff is available to work with the Lead Agency to address these issues and any other air quality questions that may arise. Please

contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

Ian MacMillan
Program Supervisor, Inter-Governmental Review
Planning, Rule Development & Area Sources

IM:GM

SBC110301-05
Control Number

Localized Air Quality Impacts

1. In the Draft EIR, the lead agency estimated localized construction air quality impacts and compared those emissions with thresholds for different receptor distances from the site boundaries assuming a maximum soil disturbance of five acres per day. Although the lead agency estimated and showed localized construction impacts for the proposed project, localized operational impacts were not shown in the Draft EIR. The AQMD therefore recommends for future development that the lead agency estimate localized operational air quality impacts on a project specific basis and include any on-site and off-site receptors within a proposed development to ensure that any nearby sensitive receptors are not adversely affected by the operational activities that are occurring in close proximity. It is noted in Figure 3-2 in the project description and in an aerial map inspection that the proposed project is located within one-quarter mile of sensitive receptors (residential properties) north, east and west of proposed project areas. AQMD guidance for performing a localized air quality analysis can be found on the AQMD web page: http://www.aqmd.gov/ceqa/handbook/LST/LST.html . Should the lead agency conclude after its analyses that construction or operational localized air quality impacts exceed the AQMD daily significance thresholds, staff has compiled mitigation measures in addition to those measures listed on starting on page 4.3-31 of the Draft EIR that can be implemented if the air quality impacts are determined to be significant. These mitigation measures can be found at: http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html .

GHG Emissions Analysis

2. It is unclear how the lead agency evaluated the GHG impacts and how it plans to ensure that the stated emission reductions will actually occur. For example, in Table 4.3-26, the unmitigated and mitigated vehicle emissions are 149,768 and 125,966 tons per year, respectively. The mitigated emissions are approximately 15.9 percent below the reported unmitigated emissions. However, the URBEMIS computer model output sheets document unmitigated and mitigated emissions of 140,707 and 137,395 tons per year, respectively. This results in only a 2.5 percent reduction. Quantification of substantial emission reductions for solid waste and water are also undocumented. Therefore, the lead agency should provide additional justification of its analysis in the Final PEIR.

   Further, upon review of the lead agency's air quality and climate change analysis, it appears that the lead agency quantified the project's greenhouse gas (GHG) emission reductions based on the implementation of a set of future land use, energy and mobile source policies applicable to the proposed project. For example, the lead agency assumes that the incorporation of mitigation measures Air-2A through Air-2M and GHG-1 through GHG-4 will result in a GHG emission reduction of 30.37% or 58,450 metric tons CO2 through 2020. However, the lead agency does not specify any

performance standards to ensure that the proposed project actually achieves the 30.37% or 58,450 metric tons of GHG reduction by 2020. Therefore, the lead agency should revise the analysis in the draft PEIR to ensure that enforceable measures are in place to reduce GHG emissions consistent with the reductions identified in Air-2A through Air-2M and GHG-1 through GHG-4 including Table 4.3-27of the draft EIR.

Construction Mitigation Measures

3. On page 4.3-24 in the Air Quality Section of the Draft EIR, the lead agency has determined for the three planning areas that short-term mitigated air quality impacts will exceed the AQMD recommended daily significance thresholds for carbon monoxide (CO), oxides of nitrogen (NOx); volatile organic compounds (VOC), and fugitive dust (PM10 and PM2.5). The AQMD recommends the following changes and additional measures to further reduce these adverse air quality impacts, if applicable and feasible. Additional mitigation measures for consideration by the lead agency for off- and on-road engines and fugitive dust can be found at http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html .

   Recommended Changes:

   Air-2A During grading activities for any future development within the Planned Development, the on-site construction superintendent shall ensure implementation of standard best management practices (BMPs) to reduce the emission of fugitive dust, including, but not limited to the following actions:

   ix. Replace ground cover in disturbed areas ~~within 30 days~~ as quickly as possible of the completion of construction activities. Dust suppression shall be required for all disturbed areas where ground cover has not yet been re-established.

   Air-2C Prior to issuance of a building permit, the City of Yucaipa shall verify that construction specifications indicate that ~~low VOC paints~~ the following measures shall be used in the construction of all buildings.

   - Use coatings and solvents with a VOC content lower than required under Rule 1113;
   - Construct/build with materials that do not require painting;
   - Require the use of pre-painted construction materials; and
   - Contractors shall use high-pressure-low-volume (HPLV) paint applicators or other application techniques with equivalent or higher transfer efficiency.

Air-2D Prior to issuance of a building permit, the City of Yucaipa shall verify that ~~construction specifications indicate that construction and paving equipment shall be EPA rated Tier 2~~ during project construction, all internal combustion engines/construction equipment operating on the project site shall meet EPA-Certified Tier 2 emissions standards, or higher according to the following schedule:

- Project Start to December 31, 2011: All off-road diesel-powered construction equipment greater than 50 hp shall meet Tier 2 off-road emissions standards. In addition, all construction equipment shall be outfitted with the BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 2 or Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

- January 1, 2012, to December 31, 2014: All off-road diesel-powered construction equipment greater than 50 hp shall meet Tier 3 off-road emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

- Post-January 1, 2015: All off-road diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

- A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.

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.

Recommended Additional Mitigation Measures:

- Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow.
- Reroute construction trucks away from congested streets or sensitive receptor areas; and

- Schedule construction activities that affect traffic flow on the arterial system to off-peak hour to the extent practicable;
- Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 mph;
- Install wheel washers where vehicles enter and exit the construction site onto paved roads or wash off trucks and any equipment leaving the site each trip.
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation.
- Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 mph;
- All trucks hauling dirt, sand, soil, or other loose materials are to be covered;
- Apply water three times daily, or non-toxic soil stabilizers according to manufacturers' specifications, to all unpaved parking or staging areas or unpaved road surfaces;
- Sweep streets at the end of the day if visible soil is carried onto adjacent public paved roads (recommend water sweepers with reclaimed water).

Toxic Air Contaminants (TAC) Mitigation Measures

4. On page 4.3-40, the lead agency discusses off-site sources of TAC emissions including residential uses in the Robinson Ranch North and Wildwood Ranch Planning Areas that would designate residential land uses within 500 feet of the I-10 freeway. Since the California Air Resources Board (CARB) has recommended siting new sensitive land uses at least 500 feet from a freeway to reduce health risks from freeway traffic borne TACs, AQMD staff recommends that Mitigation Measure Air-3B be changed, as follows, if applicable and feasible:

   Air-3B Residential units shall be set back at least 500 feet from I-10 or a project specific health risk assessment shall be conducted to identify and mitigate potential health risks from being situated within the CARB recommended buffer. Residences or other sensitive receptor uses shall not be sited within 500 feet of the I-10 freeway if a significant health risk is determined.

5. On page 4.3-41, the lead agency states, in part, that the impacts to sensitive receptors due to TAC emissions would be less than significant for the West Oak Center Planning Area (West Oak). Upon review, the West Oak area includes a business park that is planned to have up to 369,992 square feet of warehouse and light industrial uses that will be bordered by residential uses northwest of the proposed business park area. These warehouse and light industrial uses will likely include the operation of diesel fueled trucks, which are a source of TACs. Because the potential health risks to the residences from the diesel fueled truck emissions has yet to be determined, the AQMD does not agree with the lead agency's determination that TAC emissions would be less than significant. The lead agency needs to quantify and demonstrate the health risks from these sources as projects are proposed and evaluated through the

CEQA process. Therefore, AQMD staff recommends the following mitigation measure in addition to the TAC mitigation measures listed on page 4.3-41, if applicable and feasible:

- A project specific Health Risk Assessment shall be conducted to identify and mitigate potential health risks to planned or existing residences or other sensitive receptors from any new project that will be proposed within the West Oak Center Planning Area Business Park. All identified health risks will be mitigated to a level below significance prior to project approval.

Toxic Air Contaminants (TAC) Mitigation Measures

6. In Tables 4.3-15 -4.3-18, the lead agency has determined that project operational emissions will exceed the recommended daily operational thresholds for each planning area and the entire planned development for CO, NOx, reactive organic gases (ROG), and particulate matter exhaust (PM10 and PM2.5). In addition to the proposed operational mitigation measures starting on page 4.3-35 of the Draft PEIR, the AQMD recommends the following additional mitigation measures, if applicable and feasible:

- Provide a minimum buffer zone of 300 meters (approximately 1,000 feet), which can be office space, employee parking, greenbelt, etc., between truck traffic and sensitive receptors;
- Design the business park warehouse and light industrial uses such that entrances and exits are such that trucks are not traversing past neighbors or other sensitive receptors;
- Design the business park warehouse and light industrial uses such that any check-in point for trucks is well inside the facility property to ensure that there are no trucks queuing outside of the facility;
- Design the business park warehouse and light industrial uses to ensure that truck traffic within the facility is located away from the property line(s) closest to its residential or sensitive receptor neighbors;
- Restrict overnight parking in residential areas;
- Establish overnight parking within the business park warehouse and light industrial center where trucks can rest overnight;
- Establish area(s) within the facility for repair needs;
- Post signs outside of the facility providing a phone number where neighbors can call if there is a specific issue;
- Develop, adopt and enforce truck routes both in and out of city, and in and out of facilities;
- Re-route truck traffic by restricting truck traffic on certain sensitive routes;
- Improve traffic flow by signal synchronization;
- Enforce any local truck parking restrictions;
- Develop park and ride programs;
- Prohibit all vehicles from idling in excess of five minutes, both on- and off-site;

- Restrict operation to "clean" trucks;
- Electrify service equipment at facility;
- Provide electrical hook-ups for trucks that need to cool their load;
- Electrify auxiliary power units;
- Pave roads and road shoulders;
- Provide onsite services to minimize truck traffic in or near residential areas, including, but not limited to, services such as automated teller machines; etc.;
- Require or provide incentives for haul/delivery trucks to use low-sulfur diesel fuel with particulate traps;
- Have truck routes clearly marked with trailblazer signs, so trucks will not enter residential areas;
- Identify or develop secure locations outside of residential neighborhoods where truckers that live in the community can park their truck, such as a Park & Ride;
- Provide food options, fueling, truck repair and or convenience store on-site to minimize the need for trucks to traverse through residential neighborhoods;
- Re-route truck traffic by adding direct off-ramps for the truck or by restricting truck traffic on certain sensitive routes;
- Improve traffic flow by signal synchronization;
- Use water sweepers that comply with SCAQMD Rules 1186 and 1186.1; and
- Alternative fueled off-road equipment.