



**South Coast  
Air Quality Management District**  
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September 17, 2014

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**Draft Environmental Impact Report (Draft EIR) for the Proposed Belle Terre Specific  
Plan 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 revised or final Environmental Impact Report as appropriate.

Based on a review of the Draft EIR, the SCAQMD staff is concerned about the significant operational-related air quality impacts from the proposed project. Specifically, the lead agency determined that the project will exceed the SCAQMD's CEQA regional significance thresholds for VOC, NO<sub>x</sub>, CO, and PM<sub>10</sub> thresholds during operations primarily from motor vehicles that access the proposed project site. As specified in the Draft EIR, the proposed project could add up to 12, 205 more vehicle trips to and from the proposed project site on its peak day, with up to 1,282 vehicles entering and existing the proposed project site in the peak afternoon hour. As a result, the SCAQMD staff recommends the following measures be incorporated into the Final EIR pursuant to Section 15126.4 of the CEQA Guidelines, in addition to the mitigation measures included the Air Quality Section starting on page IV.D-30.

**Additional Operational Mitigation Measures – Energy Efficiency**

- Maximize use of solar energy including solar panels; installing the maximum possible number of solar energy arrays on the building roofs and/or on the proposed project site to generate solar energy for the facility.
- Require all lighting fixtures, including signage, to be the most energy efficient possible, require that new traffic signals have light-emitting diode (LED) bulbs, and require that light fixtures be energy efficient compact fluorescent and/or LED light bulbs. Where feasible use solar powered lighting.
- Use light colored paving and roofing materials.
- Use passive heating, natural cooling, solar hot water systems, and reduced pavement.
- Limit the hours of operation of outdoor lighting.

- Utilize only Energy Star heating, cooling, and lighting devices, and appliances.

Additional Operational Mitigation Measures – Transportation

- Provide electric car charging stations for tenants (not just electric vehicle wiring per local ordinance). Also, provide designated areas for parking of zero emission vehicles (ZEVs) for car-sharing programs.
- Provide incentives to encourage public transportation and carpooling.
- Provide incentives for employees and the public to use public transportation such as discounted transit passes, reduced ticket prices at local events, and/or other incentives.
- Implement a rideshare program for employees at retail/commercial sites.
- Create local “light vehicle” networks, such as neighborhood electric vehicle (NEV) systems.
- Require the use of 2010 compliant diesel trucks, or alternatively fueled, delivery trucks (e.g., food, retail and vendor supply delivery trucks) at commercial/retail sites upon project build-out. If this isn’t feasible, consider other measures such as incentives, phase-in schedules for clean trucks, etc.

Additional Operational Mitigation Measures – Other

- Require use of water-based or low VOC cleaning products.
- Provide outlets for electric and propane barbecues in residential areas.
- Require use of electric lawn mowers and leaf blowers.
- Require use of electric or alternative fueled maintenance vehicles.

Pursuant to Public Resources Code Section 21092.5, SCAQMD staff requests that the lead agency provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. Further, staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Eugene Kang, Air Quality Specialist, at (909) 396-3524, if you have any questions regarding the enclosed comments.

Sincerely,



Ed Eckerle  
Program Supervisor  
Planning, Rule Development & Area Sources

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RVC140801-06  
Control Number