



South Coast Air Quality Management District

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**Recirculated Draft Environmental Impact Report (RDEIR) for the Proposed
General Plan Amendment No. 960: General Plan Update Project
(EIR No. 521/SCH 2009041065)**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are intended to provide guidance to the lead agency and should be incorporated into the draft general plan and considered in the environmental document as appropriate to minimize localized and regional air quality impacts from future growth based on analyses from the existing 2008 baseline to 2040.

CEQA Baseline

For long-term air quality impacts, the Lead Agency has estimated mobile source operational emissions using EMFAC2007 emission factors for an existing baseline year (2008) to buildout in 2060, with the limitation that EMFAC2007 emission factors are available only through 2040. Based on its estimates, unmitigated long-term emissions including mobile sources from the existing year 2008 (baseline) through 2060 (project buildout) will exceed the SCAQMD recommended thresholds of significance for CO, ROG, SO_x, PM₁₀ and PM_{2.5}. Negative net NO_x emissions are shown in Table 4.6-E “due to the substantial decrease in anticipated vehicle emissions from vehicles mandated by increased efficiency requirements in current Federal and State law that have been implemented and will continue to affect the motor vehicle fleet between the existing year and 2040.” Although existing regulatory and other requirements have shown an improvement in the region’s air quality and is expected to continue to improve over time, the decrease in emissions from compliance from such requirements should not be considered mitigation since the reduced emissions are not a result of additional actions incorporated in the project to reduce the unmitigated emissions from mobile source vehicle emission activities.

Further, while it is appropriate to include regulatory requirements in measuring project emissions, the proposed Project’s emissions themselves should not be masked by comparing it to an existing conditions baseline where air quality is worse than what it will be when the proposed Project is operational. It is appropriate to assume that vehicles will comply with existing regulatory requirements, however their increase in activity needs to be accounted for and shouldn’t be masked by improvements brought on by those

regulations. By comparing project impacts to a baseline of actual 2008 conditions, the RDEIR fails as an information document because it does not disclose true air quality impacts from the project. This is exactly the type of situation which led the California Supreme Court to state that, "[t]o the extent a departure from the “norm[]” of an existing conditions baseline (Guidelines, [§ 15125\(a\)](#)) promotes public participation and more informed decision making by providing a more accurate picture of a proposed project’s likely impacts, CEQA permits the departure." (*Neighbors for Smart Rail v. Exposition Metro Line Const. Authority* (2013) 57 Cal. 4th 439, 453.). The SCAQMD staff recommends revising the Final REIR comparing baseline 2008 emission activities with future vehicle activity using 2008 emission factors to show the situation if no changes are made to the County General Plan.

Air Quality Policies (Proposed New or Revised General Plan Policies)

Based on the SCAQMD staff comment letter dated July 25, 2013 for Early Drafts of the Air Quality and Greenhouse Gas Elements for the General Plan, the SCAQMD staff incorporates by reference recommendations made in that comment letter in addition to the new or revised policies included in the RDEIR starting on page 4.6-30 in order to address emission reductions related to NOx and adverse health effects to sensitive receptors to meet regional goals as outlined in the 2012 Air Quality Management Plan.

Contact Information

SCAQMD 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 the enclosed comments.

Sincerely,

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