



South Coast  
Air Quality Management District

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E-Mailed: March 24, 2011  
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Community Development Department  
Murrieta, CA 92562

**Review of the Draft Environmental Impact Report (Draft EIR)**  
**for the Proposed General Plan 2035**

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 Environmental Impact Report (final EIR) as appropriate.

The AQMD staff is concerned that the proposed project places sensitive land uses (i.e., hospital, residential and park uses) within 500 feet of the I-215 Freeway. Specifically, the AQMD staff is concerned about the potential health risk impacts from toxic air pollutants emitted by the significant volume of traffic on the I-215 Freeway. Therefore, the lead agency should revise the draft EIR to include mitigation that precludes sensitive land uses within 500 feet of the I-215 Freeway. Further, AQMD staff recommends that pursuant to Section 15370 of the California Environmental Quality Act (CEQA) Guidelines additional mitigation measures are considered to minimize the project's significant air quality impacts. Details regarding these comments are attached to this letter.

Pursuant to Public Resources Code Section 21092.5, AQMD staff requests that the lead agency provide the AQMD 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

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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,



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

Attachment

IM:DG

RVC110208-05  
Control Number

### Health Risk Impacts

1. Based on the project description (i.e., chapter three) in the draft EIR the proposed project includes land use changes that will place sensitive land uses (i.e., residential, park and hospital uses) within 500 feet of the I-215 Freeway. As a result, the AQMD staff is concerned about the potential health risk impacts from toxic air pollutants emitted by the significant volume of traffic on the 215 Freeway. Therefore, the lead agency should include mitigation in the final EIR that prohibits residential development within 500 feet<sup>1</sup> of the I-215 Freeway to minimize potential significant health risk impacts.

### Mitigation Measures for Construction Air Quality Impacts

2. Given that the lead agency concluded that the proposed project will have significant air quality impacts the AQMD staff recommends that the lead agency provide additional mitigation pursuant to CEQA Guidelines §15370. Specifically, AQMD staff recommends that the lead agency minimize or eliminate significant adverse air quality impacts by adding the mitigation measures provided below.
  - Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow,
  - Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site,
  - Reroute construction trucks away from congested streets or sensitive receptor areas,
  - Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation,
  - Improve traffic flow by signal synchronization, and ensure that all vehicles and equipment will be properly tuned and maintained according to manufacturers' specifications,
  - Use coatings and solvents with a VOC content lower than that required under AQMD Rule 1113,
  - Construct or build with materials that do not require painting,
  - Require the use of pre-painted construction materials,
  - Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export),
  - 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:

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<sup>1</sup> Based on the recommendations for siting new sensitive land uses on page four of the "Air Quality and Land Use Handbook: A Community Health Perspective."

- ✓ Project Start, to December 31, 2011: All offroad diesel-powered construction equipment greater than 50 hp shall meet Tier 2 offroad 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 offroad diesel-powered construction equipment greater than 50 hp shall meet Tier 3 offroad 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 offroad 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.
- ✓ Encourage construction contractors to apply for AQMD "SOON" funds. Incentives could be provided for those construction contractors who apply for AQMD "SOON" funds. The "SOON" program provides funds to accelerate clean up of off-road diesel vehicles, such as heavy duty construction equipment. More information on this program can be found at the following website: <http://www.aqmd.gov/tao/Implementation/SOONProgram.htm>

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](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html).

#### Mitigation Measures for Operational Air Quality Impacts

3. The lead agency's operational air quality analysis demonstrates significant air quality impacts from all criteria pollutant emissions including NO<sub>x</sub>, SO<sub>x</sub>, CO, VOC, PM<sub>10</sub> and PM<sub>2.5</sub> emissions. These impacts are primarily from an increase in mobile source emissions related to a significant increase of vehicle trips associated with the

proposed project. However, the lead agency fails to adequately address this large increase in mobile source emissions. Specifically, the lead agency does not require any mitigation measures in the draft EIR and only proposes the adoption of nominal goals and policies in the General Plan 2035 document to address mobile source emissions reductions. Therefore, the lead agency should re-evaluate and reduce the project's significant air quality impacts by reviewing and incorporating transportation mitigation measures from the ICLEI-Local Governments for Sustainability protocol in the final EIR.

4. Upon review of the Climate Action Plan provided in Appendix P of the draft EIR 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 land use policy LU-6 (i.e., encourage job retention and attraction) will result in an annual GHG emission reduction of 11.14% or 52,288 metric tons CO<sub>2</sub>. However, the lead agency does not specify any performance standards to ensure that the proposed project actually achieves an annual 11.14% or 52,288 metric tons of GHG reduction annually by 2020. Therefore, the lead agency should revise the analysis in the draft EIR to ensure that enforceable measures are in place to reduce GHG emissions consistent with the reductions identified in Table 5.6-5 of the draft EIR and the aforementioned Climate Action Plan. It would seem from the description of the proposed GHG reductions in Table 5.6-5 that every new project will be required to have a net decrease in GHG emissions, but without enforceable measures this may not be achievable.