



South Coast
Air Quality Management District
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E-Mailed: April 11, 2012
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Ms. Terri Manuel
Community Development Department
City of Corona
400 South Vicentia Avenue
Corona, CA 92882-2187

**Review of the Draft Environmental Impact Report (Draft EIR)
for the City of Corona Climate Action Plan Project**

The South Coast Air Quality Management District (AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comment is intended to provide guidance to the lead agency and should be incorporated into the Final Environmental Impact Report (Final EIR) as appropriate.

Based on a review of the Draft EIR the AQMD staff recognizes the potential regional air quality and greenhouse gas (GHG) emissions benefits from the proposed project that encourages mixed land uses and alternative modes of transportation in the project area. However, AQMD staff requests that the lead agency further clarify how the policies for the proposed Corona Climate Action Plan (C-CAP) reduce GHG emissions consistent with the California Air Resources Board (CARB) Climate Change Scoping Plan¹ and provide additional technical data that demonstrates how the transportation measures in the C-CAP will be implemented. Details regarding these comments are attached to this letter.

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 EIR. Further, staff is available to work with the lead agency to address these issues and any other questions that

¹ The California Air Resources Board AB 32 Climate Change Scoping Plan document. Accessed at:
<http://www.arb.ca.gov/cc/scopingplan/document/scopingplandocument.htm>

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,

A handwritten signature in black ink that reads "Ian V. MacMillan". The signature is written in a cursive style with a large initial "I" and "M".

Ian MacMillan

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

Attachment

IM:DG

RVC120228-04
Control Number

Greenhouse Gas Emissions Analysis and Reduction Target

1. Based on a review of the Draft EIR the lead agency has determined that the proposed project will achieve its GHG reduction target of 15% below 2008 levels by 2020. However, the AQMD staff requests further clarification about how the project is consistent with statewide AB 32 goals. Specifically, the baseline year used for the proposed project is 2008 GHG emissions levels whereas the baseline year used in the CARB Scoping Plan is 2005. The AB 32 Scoping Plan proposed a 15% reduction below 2005 emissions to achieve 1990 levels by 2020. If the city's 2008 emissions levels are greater than 2005 levels then the project's proposed 15% reduction may not be sufficient to achieve 1990 levels by 2020.

Further, last year (August 2011) the CARB approved the Final Supplement² to the AB32 Scoping Plan that provided an updated business-as-usual (BAU) analysis. The updated analysis is based on a three year average between 2006 and 2008 and considers the influence of the recent recession and emission reduction measures that had been implemented since 2005. The result of the analysis indicates that a 16% GHG emissions reduction from base year (average of 2006-2008) levels is required to meet the AB 32 goals. Therefore, the AQMD staff requests that the lead agency clarify that a 15% GHG emissions reduction from 2008 levels is consistent with statewide initiatives.

Effectiveness of C-CAP Measures

2. The lead agency determines that the R (i.e., R1-R3) measures in the C-CAP will reduce GHG emissions; however, the lead agency does not present the effectiveness of each measure in emissions units. Instead the lead agency presents the effectiveness of each measure in varying units using a percentage (e.g., percent of VMT and percent of energy use); as a result, it is difficult to determine emissions reductions associated with each measure. For example, a significant portion of the project's GHG emissions impacts are from mobile source emissions (i.e., approximately 48%) related to the substantial increase of vehicle mile traveled (VMT) in the project area. Therefore, the lead agency addresses this increase in mobile source emissions with aggressive measures such as Measure R2-T1 and R2-T2 of the C-CAP that increases transportation demand and reduces VMT garnering over a four percent reduction in VMT. However, the lead agency does not provide detailed calculations that demonstrate how these measures can achieve a four percent reduction in VMT thereby substantially reducing GHG emissions. The detailed calculation should include the VMT assumptions and metrics used to determine the effectiveness of these measures. Given the lack of explicit information in the Draft EIR that ties the effectiveness of the R measures in Appendix E of the C-CAP to the project's GHG emissions reductions the AQMD staff recommends that the lead agency provide additional data and detailed calculations in the Final EIR that disclose how the assumed emissions reductions for each R measure can be achieved.

² The Final Supplement to the California Air Resources Board AB 32 Climate Change Scoping Plan document can be accessed at: http://www.arb.ca.gov/cc/scopingplan/document/final_supplement_to_sp_fed.pdf

Inconsistent Data

3. Upon review of the appendices in the C-CAP the AQMD staff noticed that the reported values for many emissions source categories (input values) and emissions inventories are inconsistent with the reported values in the Draft EIR. For example, the stated electricity emissions factors are from 2005 whereas the Draft EIR indicates that a 2008 emissions inventory was used to calculate GHG emissions. Also, the GHG emissions inventory values in Appendix D of the C-CAP are inconsistent with the values reported in Tables 4.3-2 through Tables 4.3-5 of the Draft EIR. Therefore, the AQMD staff recommends that the lead agency review the C-CAP and Draft EIR to ensure that the values used to calculate the project's GHG emissions impacts are consistent and that the measures associated with these values remain sufficient to achieve the GHG emissions reduction targets.

Consistency with CalEEmod and CAPCOA

4. Given that the proposed plan is anticipated to be widely used by projects within the City of Corona and will require the use of common land use planning and emissions estimating tools the AQMD staff requests that the lead agency review Appendix B and Appendix C of the C-CAP and consider updating the data assumptions and input values to maintain consistency with those in CalEEmod³ and the CAPCOA guidance document for quantifying GHG mitigation measures⁴.

³ <http://www.caleemod.com/>

⁴ <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>