



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

E-Mailed: February 2, 2012
mmehta@rctlma.org

February 2, 2012

Ms. Mitra Metha-Cooper
Riverside County Planning Department
4080 Lemon Street, 12th Floor
P.O. Box 1409
Riverside, CA 92502-1409

**Review of the Draft Environmental Impact Report (Draft EIR)
for the Proposed Temecula Valley Wine Country Community Plan Project**

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 about future potential localized air quality impacts to sensitive land uses (i.e., residential uses) within the project area from construction activity facilitated by the proposed project. Therefore, the lead agency should include mitigation in the Final EIR that requires all future projects in the plan area to conduct a localized air quality analysis and apply all feasible mitigation when necessary. Further, AQMD staff recommends that the lead agency consider additional mitigation measures to minimize the project's significant regional air quality and greenhouse gas emissions impacts pursuant to Section 15126.4 of the California Environmental Quality Act (CEQA) Guidelines. 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

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,

A handwritten signature in black ink that reads "Ian V. MacMillan". The signature is written in a cursive, slightly slanted style.

Ian MacMillan

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

Attachment

IM:DG

RVC111202-01
Control Number

Potential Localized Air Quality Impacts to Sensitive Land Uses

1. Based on the lead agency's discussion for Impact 4.3-3 in the Draft EIR the proposed project may include construction activity in close proximity to sensitive land uses (i.e., residential). However, the lead agency determined that since residential uses are required to be low density (i.e., one home per acre), the localized construction emissions from individual residential development will remain below the localized significance thresholds (LSTs). As a result, the AQMD staff is concerned that this assessment does not account for individual parcel layout and that in some cases, regardless of density specifications, construction of an individual project could occur such that it is adjacent to existing residents yielding potential air quality impacts during construction. Therefore, AQMD staff recommends that the lead agency provide additional mitigation that requires: (a) all projects subject to CEQA review conduct an LST analysis consistent with AQMD's LST Methodology¹ and (b) any project that demonstrates significant localized impacts to reduce the impacts to the maximum extent feasible with the appropriate onsite measures such as those identified in comment number two (2) below.

Mitigation Measures for Construction Air Quality Impacts

2. Given that the lead agency concluded that the proposed project will have significant construction related regional air quality impacts, the AQMD staff recommends that the lead agency provide additional mitigation pursuant to CEQA Guidelines §15126.4. Specifically, AQMD staff recommends that the lead agency minimize or eliminate significant adverse air quality impacts by adding the mitigation measures provided below.
 - 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) and if the lead agency determines that 2010 model year or newer diesel trucks cannot be obtained the lead agency shall use trucks that meet EPA 2007 model year NOx and PM emissions requirements,

¹ <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>

- During project construction, all internal combustion engines/construction equipment operating on the project site shall meet EPA-Certified Tier 3 emissions standards, or higher according to the following:
 - ✓ Project Start, 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.

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_x, CO, VOC, PM₁₀ and greenhouse gas emissions impacts. These impacts are primarily from mobile source emissions related to vehicle trips associated with the proposed project. However, the lead agency fails to adequately address this large source of emissions. Specifically, the lead agency requires nominal mitigation measures in the Draft EIR that lack emission reduction targets and specificity relative to the mobile source emissions. Therefore, the lead agency should reduce the project's significant air quality impacts by reviewing and incorporating additional transportation mitigation measures from

the greenhouse gas quantification report² published by the California Air Pollution Control Officer's Association and by revising mitigation measures AQ-1 through AQ-7 to provide specific emission reduction targets in the Final EIR. Further, the lead agency should be mindful of significant mobile source reductions that are needed in the near future for the South Coast Air Basin to achieve Federal Clean Air Standards by 2023 and 2030³.

² California Air Pollution Control Officer's Association. August 2010. Quantifying Greenhouse Gas Mitigation Measures. Accessed at: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

³ See page six (6) of the Powering the Future Document accessed at: <http://www.aqmd.gov/pubinfo/images/cover-spread.jpg>