South Coast
Air Quality Management District
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Draft Environmental Impact Report (Draft EIR) for the Proposed Sand Canyon Plaza Mixed-Use 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 Final EIR.

Project Description and Air Quality Analysis

The Lead Agency proposes to demolish the existing mobile home community and construct a mixed-use development consisting of 580 residential units, 55,600 square feet of retail commercial space, a 75,000-square-foot assisted living facility with up to 120 beds, and two roundabouts to the roadway improvements on an 87-acre site. In the Air Quality Section, the Lead Agency quantified the proposed project's construction and operational air quality impacts and compared those impacts to the SCAQMD's regional and localized significance thresholds. Based on the analyses, the Lead Agency found that the proposed project's operational air emissions would exceed the SCAQMD's regional operational thresholds for ROG and NOx emissions.

SCAQMD's 2016 Air Quality Management Plan

Adopted on March 3, 2017, the 2016 Air Quality Management Plan (2016 AQMP) is a regional blueprint for achieving air quality standards and healthful air in the South Coast Air Basin. Built upon the progress in implementing the 2007 and 2012 AQMPs, the 2016 AQMP provides a regional perspective on air quality and lays out the challenges facing the South Coast Air Basin. The most significant air quality challenge in the Basin is to reduce an additional 45 percent reduction in nitrogen oxide (NOx) emissions in 2023 and an additional 55 percent reduction in NOx emissions beyond 2031 levels for ozone attainment. For more information on the 2016 AQMP, please visit the SCAQMD's website, at: http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan.

As described in the 2016 AQMP, to achieve NOx emissions reductions in a timely manner is critical to attaining the National Ambient Air Quality Standard (NAAQS) for ozone before the 2023 and 2031 deadlines. SCAQMD is committed to attain the ozone NAAQS as expeditiously as practicable. Therefore, the SCAQMD staff recommends additional mitigation measures to further reduce air emissions, particularly from NOx. Please see the attachment for more information.

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 certification of the Final EIR. Further, when the Lead Agency makes the finding that the above-mentioned mitigation measure is infeasible, the Lead Agency shall describe the specific reasons for rejecting it in the Final EIR (CEQA Guidelines Section 15091).

SCAQMD staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Jack Cheng, Air Quality Specialist, CEQA IGR Section, at (909) 396-2448, if you have any questions regarding the enclosed comments.

Sincerely,

Lijin Sun

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Planning, Rule Development & Area Sources

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LAC170322-02
Control Number

ATTACHMENT

Compliance with SCAQMD Rules 1403 and 403(e)

1. SCAQMD Rule 1403. Since the proposed project includes demolition, the Lead Agency should discuss and provide additional information to demonstrate compliance with SCAQMD Rule 1403 – Asbestos Emissions from Demolition/Renovation in the Final EIR.

2. SCAQMD Rule 403(e). Since the proposed project is considered a large operation on a 87-acre site (50 acres or more of disturbed surface area; or daily earth-moving operations of 3,850 cubic yards or more on three days in any year) in the South Coast Air Basin, the Lead Agency is required to comply with all SCAQMD Rule 403(e) – Additional Requirements for Large Operations[1]. The requirements may include, but not limited to, Large Operation Notification (Form 403N), appropriate signage, additional dust control measures, and employment of a dust control supervisor that has successfully completed the Dust Control in the South Coast Air Basin training class[2]. Therefore, the Final EIR should contain a detailed description to demonstrate compliance with SCAQMD Rule 403(e).

Project Design Features (PDFs)

3. ***PDF-7 in the Draft EIR*:** The Lead Agency requires air filtration systems with filters meeting or exceeding the ASHRAE 52.2 Minimum Efficiency Reporting Value (MERV) of 11 for sensitive uses within 500 feet of the SR-14 Freeway..

   ***SCAQMD Staff Recommendation*:** The SCAQMD staff believes that there are limitations to enhanced filtration units. The Lead Agency should consider the limitations of MERV filters on housing residents. For example, in a study that SCAQMD conducted to investigate filters[3] similar to those proposed for this project, costs were expected to range from $120 to $240 per year to replace each filter. In addition, because the filters would not have any effectiveness unless the HVAC system is running, there may be increased energy costs to the resident. The proposed PDF assumes that the filters operate 100 percent of the time while residents are indoors and does not account for the times when the residents have their windows or doors open or are in common space areas of the project. MERV filters are effective in improving indoor air quality as compared to lower efficiency filters for PM10 and PM2.5 but they have no ability to filter out any toxic gasses from vehicle exhaust. The presumed effectiveness and feasibility of this PDF should therefore be evaluated in more detail prior to assuming that it will sufficiently alleviate near roadway exposures. Therefore, the SCAQMD staff recommends that the Lead Agency evaluate the effectiveness of MERV filters and include a discussion on the effectiveness of this PDF-7 in the Final EIR.

4. ***PDF-9 in the Draft EIR***: The Lead Agency requires planting vegetation between sensitive receptors and freeway sources.

   ***SCAQMD Staff Recommendation*:** The SCAQMD staff recommends the Lead Agency provide information on vegetation and landscaping types, materials, and design details that will be used to improve near road air quality in the Final EIR. This information will assist the SCAQMD staff in reviewing the effectiveness of these features in mitigating air quality impacts on sensitive receptors

[1] SCAQMD Rule 403. Last amended June 3, 2005. Available at: http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf.

[2] SCAQMD Compliance and Enforcement Staff Contact Information for Rule 403(e) Large Operations is (909) 396-2608 or by e-mail at dustcontrol@aqmd.gov.

[3] This study evaluated filters rated MERV 13+ while the proposed mitigation calls for less effective MERV 11 or better filters. Accessed at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf.

potential mitigating effects. For additional information on road side vegetation barriers, please visit: https://www.epa.gov/air-research/recommendations-constructing-roadside-vegetation-barriers-improve-near-road-air-quality.

Additional Mitigation Measures

5. CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate these impacts. The SCAQMD staff recommends the Lead Agency incorporate the following mitigation measures in the Final EIR to further reduce air emissions, particularly from NOx. Additional information on potential mitigation measures as guidance to the Lead Agency are available on the SCAQMD CEQA Air Quality Handbook website[4].

   a) Improve walkability design and pedestrian network.

   b) Increase transit accessibility and frequency by incorporating Bus Rapid Transit lines with permanent operational funding stream.

   c) Limit parking supply and unbundle parking costs. Lower parking supply below ITE rates and separate parking costs from property costs.

   d) Require use of electric lawn mowers and leaf blowers.

   e) Require that 240-Volt electrical outlets or Level 2 chargers be installed in residential garages on-site that would enable charging of NEVs and/or battery powered vehicles.

   f) Require at least 5% of all commercial vehicle parking spaces include EV charging stations. At a minimum, electrical panels should appropriately sized to allow for future expanded use.

   g) Vehicles that can operate at least partially on electricity have the ability to substantially reduce the significant NOx impacts from this project. It is important to make this electrical infrastructure available when the project is built so that it is ready when this technology becomes commercially available. The cost of installing electrical charging equipment onsite is significantly cheaper if completed when the project is built compared to retrofitting an existing building. Therefore, the SCAQMD staff recommends the Lead Agency require the proposed project to be constructed with the appropriate infrastructure to facilitate sufficient electric charging for vehicles to plug-in.

[4] South Coast Air Quality Management District. http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook.