



South Coast Air Quality Management District

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Recirculated Portions of the Draft Environmental Impact Report (RPDEIR) for the Proposed Lytle Creek Ranch Specific Plan Project

The South Coast Air Quality Management District (AQMD) staff appreciates the opportunity to comment on the above-mentioned document, including with a one day extended review period. The conversation we had with the project team on April 3 as well as the follow-up documentation sent to us today helped to clarify our understanding of the greenhouse gas (GHG) analysis for the proposed project. Because of the complexities of greenhouse gas analyses for projects such as the Lytle Creek Ranch project, AQMD staff encourages the lead agency to consult with our agency early in the planning process for future projects. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final CEQA document.

In the project description, the lead agency proposes the construction of an approximately 2,447 acre area to build approximately 8,407 dwelling units and 849,420 gross leasable square feet of commercial and industrial uses. The RPDEIR was prepared following the San Bernardino County Superior Court's ruling, dated September 30, 2011, which included an order for the lead agency to revise the EIR with respect to the GHG emissions discussion, traffic analysis, and other areas.

Business-As-Usual and Project Mitigation

The GHG emissions baseline is based on a "business-as-usual" (BAU) approach that assumes future development (including the project site) would occur in the same fashion/pattern as the surrounding Rialto community. The BAU baseline scenario includes some assumptions that should be described further in the final CEQA document. For example, the BAU scenario of 8,407 residences does not appear to include any sidewalks or trees.¹ However, the surrounding Rialto community appears to be made up of single family housing tracts containing an extensive network of sidewalks, streets, and landscaping trees. As a result, it is not clear how the addition of new trees, sidewalks, and other design measures in the project is different from BAU. Although the project may be conditioned to require these elements at an enhanced level, it appears that the

¹ The URBEMIS model used to estimate vehicular emissions reduces vehicular trip rates (and thus emissions) with the inclusion of sidewalks in a residential development. Trees have the ability to sequester carbon as they grow, which also provides an emission "credit".

existing development pattern in the Rialto community should be used to determine a baseline development level rather than assuming that these project elements would not exist at all. Additional clarification regarding this portion of the analysis should be provided in the final CEQA document.

Business-As-Usual Project Size

In both the BAU scenario and the proposed project, the number of dwelling units totals 8,407 with a mix of multi-family and single family homes. The proposed project has a higher proportion of multi-family homes than the BAU scenario. Based on communication from the lead agency, the project includes approximately 607 acres of residential development, while the BAU scenario would require approximately 1,406 acres of residential development due to the lower density associated with more single family homes. Because the size of the BAU development would be so much larger than the proposed project in areal extent, AQMD staff asks that the lead agency clarify why it isn't more appropriate to assume that the development acreage would remain the same in both scenarios with the BAU scenario assuming a lower number of dwelling units to fit in the project's 607 acres.

High Quality Transit

It appears that the project includes high quality transit with access to high-speed rail as mitigation, but it appears that the closest high frequency transit access is further than the minimum distance recommended under the California Air Pollution Control Officers Association (CAPCOA) GHG Quantification Guidelines or the URBEMIS User Guide. Clarification should be provided about how the project can take credit for this mitigation measure.

Classification of Mitigation Effectiveness

Table ES-1 of the RPDEIR includes a 42.8 percent reduction of GHG emissions for mobile sources compared with BAU. These reductions are based upon mitigation measures included in the URBEMIS computer modeling and from other sources in the air quality analysis. Since the percentage reduction is a consolidated figure, AQMD staff requests that the final CEQA document include a single table that breaks down the percent reduction with each corresponding mobile source measure to clarify the effectiveness of each measure. An example of this table is below.

Measure	Effectiveness in BAU	Effectiveness in Project
Statewide Measures	XX%	XX%
<i>Pavley Standards</i>	<i>XX%</i>	<i>XX%</i>
<i>Renewable Portfolio Standard</i>		
Project Specific Measures	XX%	XX%
<i>Vegetation</i>	<i>XX%</i>	<i>XX%</i>
<i>Access to public transit</i>	<i>XX%</i>	<i>XX%</i>
<i>Sidewalks</i>	<i>XX%</i>	<i>XX%</i>
<i>Mix of Land Use Types</i>	<i>XX%</i>	<i>XX%</i>
<i>Building Energy Efficiency (Title 24)</i>	<i>XX%</i>	<i>XX%</i>
<i>Etc.</i>		

Consistency with the RTP/SCS

The final CEQA document should clarify whether the lead agency's assumptions in the GHG analysis are consistent with the assumptions in the recently adopted Regional Transportation Plan / Sustainable Community Strategy. Since GHG reductions from AB32 are partially accounted for through implementation of the SCS, the GHG analysis for this project should clarify how this project is consistent with this plan.

Pursuant to Public Resources Code 21092.5, please provide AQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. The AQMD staff is available to work with the lead agency to address these issues and any other air quality questions that may arise. Please contact me at (909) 396-3244 if you have any questions regarding these comments.

Sincerely,



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