



South Coast  
Air Quality Management District

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FAXED: FEBRUARY 22, 2008

February 22, 2008

Mr. Michael Diaz, Senior Planner  
Planning Department  
City of Rancho Cucamonga  
10500 Civic Center Drive  
Rancho Cucamonga, CA 91729

**Draft Mitigated Negative Declaration (Draft MND) for the Proposed Environmental Assessment (EA) and Conditional Use Permit DRC2007-00455**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The air quality analysis for the proposed project tiered off of a Final EIR that is now over six years old. The SCAQMD has repeatedly advised the lead agency that the URBEMIS7G computer model cited in the 2001 General Plan EIR is woefully out of date because that model uses old emission factors and obsolete trip rate information. The lead agency has also not quantified criteria pollutant emissions from the construction or operation of the project. It is unclear why the City refuses to comply with the California Environmental Quality Act (CEQA) by not quantifying the air quality impacts in the CEQA documents for projects where it is the lead agency. It is the lead agency's responsibility to quantify impacts from the proposed project and to disclose those potential impacts in its CEQA documents.

The SCAQMD staff would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

Steve Smith, Ph.D.  
Program Supervisor  
Planning, Rule Development & Area Sources

Attachment

SS:GM

SBC080129-05  
Control Number

### **Lead Agency Does Not Estimate Construction/Operational Emissions**

1. The SCAQMD has repeatedly advised the lead agency that the general plan analysis using URBEMIS7G is woefully out of date because the model relies on EMFAC7G on-road mobile source emission factors, which have since been updated several times. Relying on a model using EMFAC7G emission factors substantially underestimates mobile source emissions. Further, URBEMIS7G relies on trip generation rates from a version of the ITE Trip Generation Manual that has been obsolete for a number of years. The URBEMIS model continues to be updated to reflect the most current on- and off-road emission factors, trip generation rates, and methodologies available. The most current version of the model, URBEMIS2007 version 9.2.4, was originally released in early June 2007 (Version 9.2) and the most recent update became available in February 2008 (Version 9.2.4). URBEMIS 2007 version 9.2.4 is available to lead agencies to assist them with calculating project-specific impacts for projects in their jurisdiction. Alternatively, the lead agency can calculate air quality impacts using the SCAQMD's CEQA Air Quality Handbook, as long as the most current emission factors are used.

Some of the advantages of using the URBEMIS2007 model, in addition to the fact that it relies on the most current on- and off-road emission factors, are that it also calculates PM<sub>2.5</sub> emissions (see comment #2) and CO<sub>2</sub> emissions. CO<sub>2</sub> is a greenhouse gas. The lead agency should be aware that the Attorney General has indicated that an EIR or MND must analyze greenhouse gas emissions. For this reason and based on the passage of AB32 and recent litigation over CEQA documents, the SCAQMD is advising lead agencies to quantify greenhouse gas emissions.

Because the lead agency has not quantified project-specific air quality impacts from the proposed project, it has not demonstrated that the proposed project will not generate significant adverse construction or operational air quality impacts that may trigger further analysis pursuant to the California Environmental Quality Act.

The lead agency can download the current URBEMIS 2007 land use emissions model at <http://www.urbemis.com> or, as previously mentioned, follow the calculation methodologies in Chapter 9 and the Appendix to Chapter 9 in the South Coast AQMD's CEQA Air Quality Handbook, as long as the most current emission factors are used.

### **PM<sub>2.5</sub> Significance Thresholds**

2. In response to adoption of PM<sub>2.5</sub> ambient air quality standards by U.S. EPA and CARB, SCAQMD staff has developed a methodology for calculating PM<sub>2.5</sub> emissions when preparing air quality analyses for California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) documents. To determine if PM<sub>2.5</sub> air quality impacts are significant, SCAQMD staff has also developed recommended regional and localized significance thresholds. When

preparing the air quality analysis for the proposed project, it is recommended that the lead agency perform a PM2.5 significance analysis by following the guidance found at [http://www.aqmd.gov/ceqa/handbook/PM2\\_5/PM2\\_5.html](http://www.aqmd.gov/ceqa/handbook/PM2_5/PM2_5.html) Further, SCAQMD staff has compiled mitigation measures to be implemented if the PM2.5 impacts or other pollutant air quality impacts are determined to be significant. Mitigation measure suggestions can be found at [http://www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html)

### **Localized Significance Thresholds**

3. As noted in the Surrounding Land Uses and Settings on page 2 in Part II of the Initial Study/Draft MND, the proposed project is located within one-quarter mile of single-family homes east of the proposed project. Therefore, the SCAQMD requests that the lead agency evaluate localized air quality impacts to ensure that any nearby sensitive receptors are not adversely affected by the construction activities that are occurring in close proximity. SCAQMD guidance for performing a localized air quality analysis can be found at the following web address:  
<http://www.aqmd.gov/ceqa/handbook/LST/LST.html> .