



South Coast  
Air Quality Management District

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P.O. Box 1409  
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**Draft Mitigated Negative Declaration (Draft MND) for the Proposed Environmental  
Assessment Number 40833/Tentative Tract Map No. 34420**

The South Coast Air Quality Management District (SCAQMD) 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.

Please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. 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  
Program Supervisor – CEQA Section  
Planning, Rule Development & Area Sources

Attachment

SS:GM

RVC081003-03  
Control Number

### **Construction/Operational Air Quality Impacts**

1. In the Draft Mitigated Negative Declaration's (Draft MND) project description, the lead agency proposes the construction of a 111 unit condominium complex and other construction on a 12.45-acre site but does not quantify the project's construction or operation air quality impacts. Because this information has not been included in the Draft MND, the lead agency has therefore 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. Consistency with an Air Quality Element of a General Plan is not a substitute for quantifying emissions from a proposed project and comparing the results to an applicable significance threshold.

To calculate the proposed project's emission impacts, the lead agency can utilize the current URBEMIS 2007 land use emissions model, which can be accessed at <http://www.urbemis.com> or follow the calculation methodologies in Chapter 9 and the Appendix to Chapter 9 in the South Coast AQMD's CEQA Air Quality Handbook. 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. Based on the passage of AB32 and recent litigation over CEQA documents, the SCAQMD is advising lead agencies to quantify greenhouse gas emissions and make a determination regarding whether or not greenhouse gas emissions are significant. Should the lead agency conclude after its analyses that construction or operational air quality impacts exceed the SCAQMD daily significance thresholds, staff has compiled mitigation measures to be implemented if the 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**

2. If the proposed site is located less than a quarter-mile from an existing sensitive receptors (residences, child-care centers, schools, hospitals, etc.), a localized air quality analysis may be warranted to ensure that any residents, children, patients, etc., at any existing sensitive receptor site 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>.

### **PM<sub>2.5</sub> Analysis**

3. 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 PM2.5 air quality impacts are significant, SCAQMD staff has also developed applicable 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)

#### **Siting of a Sensitive Land Use Near an Existing Distribution Center**

4. Because the Mitigated Negative Declaration (MND) provides very little information about the project description or surrounding land uses, it is unclear exactly where the proposed project will be located. A more robust project description and location of the project or a map showing the location of the proposed project pursuant to CEQA Guidelines § 15071(b) would be helpful. Similarly, a better description of surrounding land uses would also be helpful. For example, on page 2 of the MND, the lead agency describes the land use to the north as “commercial industry.” A review of an aerial photograph of the area described in the MND indicates that the commercial facility appears to be a large warehouse/transfer facility. Warehouse/transfer facilities have the potential to generate substantial heavy-duty diesel truck trips. Diesel particulate matter (DPM) has been classified as a carcinogen by the California Air Resources Board. Depending on the distance between the proposed residential development and the warehouse/transfer facility, the warehouse/transfer facility has the potential to create significant adverse cancer risks to the future residents of the proposed project.

California Air Resources Board (CARB) has published the “Air Quality and Land Use Handbook: A Community Health Perspective (April 2005) “(Handbook), which is available at the following website: <http://www.arb.ca.gov/ch/aqhandbook.htm>. This document includes recommendations for siting projects that include sensitive land uses (schools, residences, playgrounds, convalescent centers, nursing homes, long-term health care facilities, etc.) close to distribution center operations, resulting in exposures to associated mobile source emissions that may lead to adverse health effects beyond those associated with regional air pollution in urban areas. The CARB Handbook is based on a number of health studies and states, in part that there is an association “between residential proximity to high traffic roadways and a variety of respiratory symptoms, asthma exacerbations, and decreases in lung function in children.” The key observation according to these studies cited in the CARB Handbook is that “close proximity increases both exposure and the potential for adverse health effects.” Other effects associated with traffic emissions according to the CARB Handbook include “premature death in elderly individuals with heart disease”. Based on findings of the CAL/EPA and CARB Air Quality and Land Use Handbook, the following advisory recommendation is made:

Recommendation:

- Avoid siting new sensitive land uses within 1,000 feet of a distribution center (that accommodates more than 100 trucks per day, more than 40 trucks with operating TRUs [Transport Refrigeration Units] per day, or where TRU unit operations exceed 300 hours per week).
- Take into account the configuration of existing distribution centers and avoid locating residences and other sensitive land uses near entry and exit points.
- Alternately, the lead agency can perform a health risk assessment to determine whether or not cancer risks are significant. If cancer risks are significant, consider the above recommendations.