



South Coast  
Air Quality Management District

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**Draft Environmental Impact Report (Draft EIR) for the Proposed Serrano Summit  
Area Plan 2009-01 and Tentative Tract Map No. 17331**

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 CEQA document.

In the project description, the lead agency proposes the subdivision of a 98.9-acre site into 37 lots including 19 lots for residential, public facilities, and parks and recreation. The proposed project would construct up to 833 dwelling units and include earthwork of approximately 1.72 million cubic yards of cut and fill, which would be balanced on-site. Surrounding uses include light industrial uses to the north and residences to the east, south, and west. Within these uses, there are two warehouse-type buildings that total approximately 300,000 total square feet in size and have multiple truck loading docks.

The AQMD staff is concerned about potential health risk impacts to future sensitive receptors (i.e., residences) within the project boundaries from diesel fueled trucks operating at the industrial site. In Figure 2 (Master Land Use Plan), the lead agency has indicated that medium-density residential uses are planned in the project area including the north-east portion of the project boundaries. These future residences would be located, at some points, less than 400 feet from the nearest loading dock at the adjacent industrial park. Given the potentially significant number of diesel fueled trucks operating adjacent to the project site<sup>1</sup> and that the California Air Resources Board has determined that diesel particulate matter is carcinogenic, the AQMD staff recommends that the lead agency conduct a health risk assessment to determine potential health impacts to the proposed residential uses near those industrial sources. The SCAQMD has

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<sup>1</sup> 300,000 ft<sup>2</sup> of warehouse space would generate approximately 777 daily truck trips.

developed a methodology for estimating cancer risks from mobile sources in a document entitled Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions.<sup>2</sup>

In addition, the AQMD staff recommends that lead agency clarify in the Final EIR how construction air quality impacts from the estimated 1.72 million cubic yards of cut and fill were quantified in the Draft EIR. Upon review of the air quality analysis, the lead agency estimated air quality impacts using both URBEMIS2007 CalEEMod computer models. In both cases, the lead agency seemed to estimate emissions from soil disturbance using the default settings rather than greater level of detail to account for the substantial cut and fill activities in the case of the URBEMIS2007 model or modifying the amount and types of equipment using the CalEEMod model. The AQMD staff therefore recommends that the lead agency clarify how the cut and fill impacts were quantified and include those air quality impacts and supporting documentation (e.g., methodologies, equations, emission factors, etc.) in the Final CEQA document. Otherwise, total short-term air quality impacts could be substantially underestimated. Should the lead agency conclude after its analyses that air quality impacts exceed the AQMD daily significance thresholds, staff has compiled mitigation measures in addition to those measures listed starting on page 5.1-15 of the Draft EIR that can be implemented if the air quality impacts are determined to be significant.<sup>3</sup>

Pursuant to Public Resources Code Section 21092.5, please provide the 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 Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,



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Planning, Rule Development & Area Sources

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<sup>2</sup> [http://www.aqmd.gov/ceqa/handbook/mobile\\_toxic/diesel\\_analysis.doc](http://www.aqmd.gov/ceqa/handbook/mobile_toxic/diesel_analysis.doc) .

<sup>3</sup> [http://www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html)