



# South Coast Air Quality Management District

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## **Mitigated Negative Declaration (MND) for the Yorba XC Project**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments on the air quality analysis should be considered by the City of Chino (Lead Agency) and included in the Final MND.

In the MND, the Lead Agency will build a 325,300-square-foot warehouse and a 60,000-square foot educational center on 18.87 acres (Proposed Project). Figures 2-4 and 2-5 in the MND showed that an existing school is located immediately south of the Proposed Project and that existing residential uses are located west of the Proposed Project. Construction will take place over a period of 17 months<sup>1</sup>. During operation, the warehouse portion of the Proposed Project would involve 168 truck trips per day<sup>2</sup>. In the MND, the Lead Agency stated that the educational center will serve as an office administrative building for the Chino Valley Unified School District and will not include publicly accessible ancillary uses often provided in a school district office, such as education resources or student assessments<sup>3</sup>.

Based on a review of the MND and technical appendices, South Coast AQMD staff found that the MND did not perform a mobile source health risk assessment. Because the warehouse portion of the Proposed Project will attract heavy-duty, diesel-fueled vehicular trips (e.g., 168 truck trips per day) during operation, it is recommended that the Lead Agency perform a mobile source health risk assessment and compare the Proposed Project's cancer risk to South Coast AQMD CEQA significance threshold of 10 in one million for cancer risk to determine the level of significance for the Proposed Project's health risk impact in the Final MND<sup>4</sup>.

The California Air Resources Board's (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective*<sup>5</sup> is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process with additional guidance on strategies to reduce air pollution exposure near high-volume roadways available in CARB's technical advisory<sup>6</sup>.

Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process. Please provide South Coast AQMD with written responses to all comments contained herein

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<sup>1</sup> MND. Page 3-17.

<sup>2</sup> *Ibid.* Page 3-19.

<sup>3</sup> *Ibid.* Page 4-62.

<sup>4</sup> South Coast AQMD's guidance for performing a mobile source health risk assessment can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.

<sup>5</sup> CARB's *Air Quality and Land Use Handbook: A Community Health Perspective* can be found at: <http://www.arb.ca.gov/ch/handbook.pdf>.

<sup>6</sup> CARB's technical advisory can be found at: <https://www.arb.ca.gov/ch/landuse.htm>.

prior to the adoption of the Final MND. When responding to issues raised in the comments, responses should provide sufficient details giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and the public who are interested in the Proposed Project.

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact me at [lsun@aqmd.gov](mailto:lsun@aqmd.gov) if you have questions or wish to discuss the comments.

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

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