



South Coast Air Quality Management District

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October 26, 2012

Mr. Jay Olivas, Project Planner, jolivas@rctima.org
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Initial Case Transmittal for Tentative Parcel Map No. 36456 (Schedule H) for the Proposed Construction of the San Cristobal Labor Housing Mobile Home Park, Community Center and Day Care Facility

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 draft CEQA document and applicable air quality analyses when circulated for public review. Please send the SCAQMD a copy of the Draft CEQA document upon its completion to the address in our letterhead and to the attention of the letter's signatory.

In addition, please send with the draft CEQA document all appendices or technical documents related to the air quality and greenhouse gas analyses. These include the emission calculations, methodologies, equations, emission factors, etc., used to estimate project air quality impacts. Without the supporting air quality documentation, the SCAQMD will be unable to complete its review of the air quality analysis in a timely manner. For the air quality analysis, the SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The SCAQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720. The lead agency may wish to consider using land use emissions estimating software such as the recently released CalEEMod. This model is available on the SCAQMD Website at: <http://www.aqmd.gov/ceqa/models.html>.

The Lead Agency should identify any potential adverse air quality impacts including regional emissions that could occur from all phases of the project and all air pollutant sources related to the project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources

(e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, that is, sources that generate or attract vehicular trips should be included in the analysis.

The AQMD requests that the lead agency quantify PM_{2.5} emissions and compare the results to the recommended PM_{2.5} significance thresholds. Guidance for calculating PM_{2.5} emissions and PM_{2.5} significance thresholds can be found at the following internet address: http://www.aqmd.gov/ceqa/handbook/PM2_5/PM2_5.html.

Further, in addition to regional air quality impacts, the AQMD also recommends that localized air quality impacts be estimated and the results compared to localized significance thresholds (LSTs). LST's can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the proposed project, it is recommended that the lead agency perform a localized significance analysis by either using the LSTs developed by the AQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>.

In addition to the above analyses, the proposed project site is located just north of the Union Pacific Railroad right of way and is located near many agricultural uses. The AQMD requests that the estimated train traffic including the number of trains be included in the draft CEQA document. In addition, the draft document should include a discussion of any agricultural spraying that may occur that might impact the proposed residents living at the park, using the community center as well as the children using the day care facility.

In the event that the project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate significant adverse air quality impacts. To assist the Lead Agency with identifying possible mitigation measures for the project, please refer to Chapter 11 of the SCAQMD CEQA Air Quality Handbook for sample air quality mitigation measures. Additional mitigation measures can be found on the SCAQMD's CEQA web pages at the following internet address: www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html .

Please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. The AQMD staff is available 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.

Mr. Jay Olivas,
Project Planner

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October 26, 2012

Sincerely,

A handwritten signature in black ink that reads "Ian V. MacMillan". The signature is written in a cursive, slightly slanted style.

Ian MacMillan
Program Supervisor, Inter-Governmental Review
Planning, Rule Development & Area Sources

IM:GM

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