



South Coast Air Quality Management District

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November 9, 2006

Mr. Donn Montag
City of Rialto Development Services Department
Planning Division
150 South Palm Avenue, Rialto, CA 92376

Dear Mr. Montag:

**Draft Environmental Impact Report
Rancho El Rivino Specific Plan and Annexation
City of Rialto, San Bernardino County**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The SCAQMD would also like to thank the Lead Agency for the additional time to submit comments. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final Environmental Impact Report.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final Environmental Impact Report. 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 George Illes, Air Quality Specialist – CEQA Section, at (909) 396-3177, if you have any questions regarding these comments.

Sincerely,

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

Attachment

SS:GI

SBC060926-02
Control Number

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Rancho El Rivino Specific Plan and Annexation
City of Rialto, San Bernardino County**

Air Quality Impact Analysis

1. Page 4.2-9 – SCAQMD recommends that Table 4.2-2 (*Air Quality Monitoring Summary: 2003-2005*) include the 1-hour carbon monoxide (CO) data to provide complete information on recent air quality data in the local area.
2. Page 4.2-16 – The section under “Localized Significance Thresholds” states the following: “As shown in Table 4.2-4, emissions of NO_x and CO are below the SCAQMD localized significance thresholds.” However, Table 4.2-4 shows NO_x exceeds the localized significance thresholds (LST), therefore it is recommended that the sentence be revised to be consistent with the conclusions in Table 4.2-4.
3. P.4.2-20 – The section under “Long Term Emissions” states the following: “Long term operational impacts from the project will result in significant impact to CO.” This appears to be a typographical error, as the report goes on to state localized concentrations of CO are not significant. It is recommended that the sentence be revised to accurately reflect the conclusions of the CO hotspots analysis.
4. P.4.2-29 – Reference is made to mitigation measures 2-10 and 2-11, however neither measure is called out in detail. It is unclear if this is a typographical error or if the measures were mistakenly omitted.
5. P.5-7 – In the cumulative impacts section the reports states the following: “Note that there are no significance thresholds for cumulative impact...” It should be noted that the SCAQMD recommends using the mass daily regional significance thresholds as indicators of significance for both project-specific and cumulative impacts. SCAQMD recommends referencing these same thresholds in Table 5-3. Cumulative air quality impacts for any pollutant that exceeds the mass daily significance thresholds should be considered significant. This conclusion would be in addition to the conclusion that air quality impacts from the project are cumulatively considerable because the project is not consistent with the most recently adopted AQMP.

Mitigation Measures

6. P.4.2-27 – SCAQMD recommends removing the following sentences from all mitigation measures: “This measure to be implemented to the satisfaction of the City Development Services Director or his designee.” Mitigation measures support the report’s overall conclusion and therefore must be performed as described.

7. To mitigate construction related impacts below the localized significance threshold, SCAQMD recommends the use of diesel oxidation catalysts or diesel particulate filters during the construction phase to reduce PM10 impacts to less than significant.
8. The LST analysis was performed for an area of 25 acres. Since the total project is larger than 25 acres, SCAQMD recommends including a mitigation measure that limits daily construction to no more than 25 acres to ensure that localized air quality impacts are not greater than reported in the DEIR.

URBEMIS

9. The value for vehicle miles traveled (VMT) appears low. SCAQMD recommends using 20 miles one way unless evidence is shown that a lower value is more applicable.
10. Construction-related mitigation measures used in the URBEMIS modeling run include watering exposed surfaces, using soil stabilizers, covering all stockpiles with tarps, watering haul roads, and reducing speeds on unpaved roads. However, please note that a bug has been identified in the model with regards to mitigating PM emissions during grading. Until it is corrected, SCAQMD recommends not to select a combination of PM mitigation measures for grading, but rather select the "user defined" control measure (watering three times per day) and then manually insert 68 percent in the control efficiency box.
11. A truck capacity of 200 cubic yards is used. However, this is 10 times the default and does not seem reasonable. SCAQMD recommends that the lead agency provide documentation that truck capacity can accommodate 200 yards.

Localized Threshold Significance

12. According to the localized significance threshold analysis, a rate of 16.39 pounds per day PM10 was modeled. Instead, SCAQMD recommends that the highest PM10 emission rate during grading be modeled and included in the final environmental impact report. See comment 10 above.