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## <u>Draft Mitigated Negative Declaration (Draft MND) for the Proposed Pinacate</u> Middle School Modernization

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 at this school campus, the lead agency proposes the demolition of the existing 8,730 square foot gymnasium, the relocation of approximately 27 out of 34 existing modular classrooms, the removal of approximately seven modular classrooms, and the construction of three new buildings (gymnasium building, administration/library building and classroom building) for a total of 65,637 square feet of new building area construction.

Under Section 3.8 Hazards and Hazardous Materials including page 57 of the Draft MND, the lead agency indicates that there are no permitted or unpermitted facilities located within one quarter-mile of the site that might reasonably be anticipated to emit hazardous air emissions. AQMD staff notes that there are three potential sources of emissions that should be analyzed in a Health Risk Assessment (HRA) prior to finalizing the MND for this project. These sources include:

- 1. Navigator Yachts, a permitted facility located approximately 0.2 miles northeast of the school site; and
- 2. Diesel emissions from the Orange Empire Railway Museum located about 0.15 miles to the southeast of the site; and
- 3. Diesel emissions from potential rail cargo activity that will occur on the rail spur located approximately 500 feet east of the site. Potential increased rail activity has been proposed along this spur for the Phase 2 site of the South Perris Industrial project (SCH No. 2008071060).

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 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.

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Sincerely,

Ian MacMillan

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

IM:GM

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