



# South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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## **Mitigated Negative Declaration (MND) for the Proposed Smith Ranch Self-Storage Project (PA No. 16-0138)**

The South Coast Air Quality Management District (SCAQMD) staff 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 MND.

### SCAQMD Staff's Summary of Project Description and Air Quality Analysis

The Lead Agency proposes to construct a 166,411-square-foot storage facility of mini warehouse use, a 1,150-square-foot leasing office, and 4,837 square feet of separate leasable office use on 9.75 acres (Proposed Project). Construction would occur over three phases with Phase I beginning in the first quarter of 2018. Based on a review of aerial photograph<sup>1</sup>, SCAQMD staff found that the Proposed Project is surrounded by residential uses with commercial uses and undeveloped lands to the west. In the Air Quality Section, the Lead Agency quantified the Proposed Project's construction and operational emissions and compared those emissions to SCAQMD's regional and localized air quality CEQA significance thresholds to determine the significance of air quality impacts. Based on the analyses, the Lead Agency found that the Proposed Project's localized on-site construction emissions from PM10 and PM2.5 would be less than significant after incorporating Mitigation Measure (MM) AQ-1<sup>2</sup>.

### SCAQMD Staff's Comments

#### *Health Risk Assessment*

The Lead Agency conducted a Traffic Impact Analysis for the Proposed Project and found that the Proposed Project is estimated to generate a net total of 299 trip-ends per day on a typical weekday with approximately 21 AM peak hour trips and 34 PM peak hour trips<sup>3</sup>. Since the Proposed Project generates or attracts vehicular trips, and the Proposed Project is located immediate adjacent to sensitive receptors (e.g., residential uses), SCAQMD staff recommends that the Lead Agency consider the health impacts of air pollutants on people living next to the Proposed Project by performing a mobile source health risk assessment (HRA)<sup>4</sup> to disclose the potential health risks in the Final MND<sup>5</sup>. Should the Lead Agency finds that, after conducting a HRA, the Proposed Project's Maximum Exposed Individual Resident cancer

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<sup>1</sup> MND. Figure 3, *Aerial Photograph*. Page 9.

<sup>2</sup> MND. Table 3-3 and Table 3-4. Pages 31.

<sup>3</sup> MND. Appendix 10.0, *Traffic Impact Analysis*. Page 1.

<sup>4</sup> South Coast Air Quality Management District. "Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis." Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.

<sup>5</sup> SCAQMD has developed the CEQA significance threshold of 10 in one million for cancer risk. When SCAQMD acts as the Lead Agency, SCAQMD staff conducts a HRA, compares the maximum cancer risk to the threshold of 10 in one million to determine the level of significance for health risk impacts, and identifies mitigation measures if the risk is found to be significant.

risk would exceed SCAQMD’s CEQA significance threshold of 10 in one million for cancer risk, the Lead Agency should consider and incorporate feasible mitigation measures in the Final MND.

*Recommended Changes to the Existing Mitigation Measure AQ-1*

CEQA requires that all feasible mitigation measures go beyond what is required by law to minimize any significant impacts. To further reduce PM10 and PM2.5 emissions during construction, SCAQMD staff recommends the following changes to the existing Mitigation Measure AQ-1 that the Lead Agency should include in the Final MND. Additional information on potential mitigation measures as guidance to the Lead Agency is available on the SCAQMD CEQA Air Quality Handbook website<sup>6</sup>.

**AQ-1 Construction Impacts to LSTs.** During site preparation and grading phases of construction, all rubber tired dozers shall be CARB certified Tier 3 4 or higher. In the event that construction equipment cannot meet the Tier 4 engine certification, the Project representative or contractor must demonstrate with written findings supported by substantial evidence that is approved by the Lead Agency to implement other technologies/strategies. Alternative strategies may include, but would not be limited to, reduction in the number and/or horsepower rating of construction equipment, limiting daily construction activities, and/or limiting the number of individual construction project phases occurring simultaneously.

Timing/Implementation: During any ground-disturbing construction activities  
Enforcement/Monitoring: City of Wildomar Public Works Department.

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. SCAQMD 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 any questions.

Sincerely,



Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

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Control Number

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<sup>6</sup> South Coast Air Quality Management District. <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.