



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 Environmental Assessment NO. 43055 Project

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 CEQA Document.

SCAQMD Staff's Summary of Project Description

The lead agency proposes to construct 15 buildings totaling 138,495 square feet (sf), consisting of 49,100 sf of retail and 89,395 sf of business park on 14.06 acres (proposed project).¹ The proposed project will include seven office/warehouse buildings and eight retail buildings, four of which include restaurants. The proposed project is located north of Benton Rd, southeast of Winchester Blvd., and west of Leon rd.

SCAQMD Staff's Summary of Air Quality Analysis

In the air quality analysis, the lead agency quantified emissions resulting from construction of the proposed project and compared those emissions to SCAQMD's air quality CEQA significance thresholds. Upon review of the air quality analysis, SCAQMD staff found that the analysis did not adequately analyze regional and localized emissions resulting from operation of the proposed project. SCAQMD staff's comments on the air quality analysis are provided below.

General Comments

In the air quality analysis on page 16 of the Mitigated Negative Declaration (MND), operational air quality impacts are included but they appear to be identical to the construction impacts on page 18. Also, the MND uses the same two emissions estimation tables to determine significance without differentiating between the construction and operational phases of the proposed project, or regional and localized air quality impacts. Additionally, the only two phases of construction that were included in the air quality analysis were on-site preparation and on-site grading. Therefore, SCAQMD staff recommends the lead agency revise the air quality analysis to quantify regional and localized air quality impacts from all phases of construction and operation of the proposed project. Guidance on preparing an air quality analysis can be found in the SCAQMD CEQA Air Quality Handbook, available on SCAQMD's website at: [http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)).

Additionally, the MND identifies the impacts to air quality during construction as a potentially significant impact prior to implementation of mitigation measures AQ-1 through AQ-6, which require the use of Tier

¹ MND. Page 3

3 diesel engines and level 3 diesel particulate filters.² However, the MND only lists one mitigation measure relating to air quality, requiring watering of the grading area to minimize fugitive dust. SCAQMD recommends the lead agency clarify which mitigation measures resulted in a quantifiable reduction shown in the air quality analysis, and include any additional applicable mitigation measures in the final CEQA document.

Lastly, an older version of CalEEMod (Version 2013.2.2)³ was used to quantify the proposed project's estimated emissions. Updates to CalEEMod (Version 2016.3.2) were available since October 2017. SCAQMD staff recommends that the lead agency use the latest version of CalEEMod (Version 2016.3.2) to quantify the proposed project's construction and operational emissions in the final MND.

Permits and Compliance with SCAQMD Rules

In the event that the Proposed Project requires a permit from the SCAQMD, the SCAQMD should be identified as a responsible agency for the Proposed Project. For more information on permits, please visit SCAQMD webpage at: <http://www.aqmd.gov/home/permits>. Questions on permits can be directed to SCAQMD's Engineering and Permitting staff at (909) 396-3385.

Conclusion

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the final CEQA Document. The SCAQMD staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Robert Dalbeck, Assistant Air Quality Specialist - CEQA IGR Section, at rdalbeck@aqmd.gov, if you have any questions regarding these comments.

Sincerely,

Daniel Garcia

Daniel Garcia

Program Supervisor

Planning, Rule Development & Area Sources

DG/RD

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² MND, Page 15

³ MND, Page 14