



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
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SENT VIA E-MAIL:

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[bent@RanchoMirageCA.gov](mailto:bent@RanchoMirageCA.gov)

Ben Torres, Associate Planner  
City of Rancho Mirage, Planning Department  
69-825 Highway 111  
Rancho Mirage, California 92270

## **Mitigated Negative Declaration (MND) for the Rancho Mirage Auto Plaza**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments on the CEQA construction air quality impacts analysis should be considered by the City of Rancho Mirage (Lead Agency) and included in the Final MND.

In the MND, the Lead Agency will build 130,814 square feet of retail and automobile service buildings on a 15.78-acre portion of 25.54 acres (Proposed Project). The Proposed Project is located on southwest corner of State Route 111 and Library Way in the City of Rancho Mirage. Construction will take place over a two-year period with buildout in 2022<sup>1</sup>. During the grading phase, the Proposed Project will result in 16,813 cubic yards of soil for export and require 2,102 hauling truck trips for soil export<sup>2</sup>. The Lead Agency calculated criteria pollutants emissions from construction activities and concluded that those emissions would not exceed South Coast AQMD regional air quality CEQA significance thresholds for construction<sup>3</sup>.

Based on a review of the MND and technical appendices, South Coast AQMD staff found that the Lead Agency used a default one way trip length of 20 miles to quantify the Proposed Project's construction emissions from exporting soil during the grading phase. In the Utilities and Service Systems Section of the MND, the Lead Agency has identified two landfill facilities to serve the Proposed Project: the Lamb Canyon Landfill in Beaumont, California and the Badlands Landfill in Moreno Valley, California<sup>4</sup>. As shown in Table A below, the closest off-site landfill facility to the Proposed Project is the Lamb Canyon Landfill that is at least 40 miles away (one way). The Proposed Project would require 2,102 hauling truck trips during the grading phase for soil export. Using a default one way trip length of 20 miles likely underestimated the Proposed Project's construction emissions, particularly NOx emissions, from haul truck trips for soil export. As such, South Coast AQMD staff recommends that the Lead Agency provide additional information in the Final MND to justify the use of a default one way trip length. Alternatively, to conservatively analyze the Proposed Project's construction air quality impacts, the Lead Agency should re-calculate the Proposed Project's construction emissions from haul truck trips based on a 52-mile one way trip length. If the Lead Agency

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<sup>1</sup> MND. Page 20.

<sup>2</sup> MND. Appendix A – Air Quality. PDF pages 2 and 8.

<sup>3</sup> MND. Page 20.

<sup>4</sup> MND. Page 64.

finds, after revisions, that the Proposed Project's construction emissions would be significant, mitigation measures will be required (CEQA Guidelines Sections 15070 and 15071).

**Table A: Trip Lengths to Landfill Facilities Identified in the MND**

<b><u>Off-site Disposal Landfill Facility Identified in the MND</u></b>	<b><u>Location</u></b>	<b><u>Estimated One Way Trip Length from the Proposed Project</u></b>
Lambs Canyon Landfill	16411 Lambs Canyon Road, Beaumont, California 92223	45 miles
Badlands Landfill	31125 Ironwood Avenue, Moreno Valley, California 92555	52 miles

Source: South Coast AQMD staff generated using Google Maps. Date: April 2021.

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. Please provide South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, responses should provide sufficient details giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and the public who are interested in the Proposed Project.

South Coast AQMD 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 questions or wish to discuss the comments.

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

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