



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:

November 9, 2022

elangan@rivco.org

Evan Langan, Principal Planner
Riverside County, Planning Department
P.O. Box 1409
Riverside, California 92502-1409

**Mitigated Negative Declaration (MND) for the Proposed
Paradise Valley Ranch Conditional Use Permit No. 210005 Project (Proposed Project)
(State Clearinghouse No. 2022100443)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The Riverside County is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. The following comments include recommended revisions to the CEQA localized air quality impacts analysis for construction and operation, construction duration, and information about South Coast AQMD rules and permits that the Lead Agency should incorporate in the Final MND.

South Coast AQMD Staff's Summary of Project Information in the MND

Based on the MND, the Lead Agency proposes to develop two new structures and re-develop into the west coast "Center of Excellence" for firefighter mental and behavioral health and research/training site for the Wildfire Conservancy.¹ The Proposed Project is located at 43700 Cactus Valley Road in the unincorporated southwest Riverside County.² The Proposed Project will be constructed into two phases, with the first phase will be divided into two sub-phases.³ Based on a review of aerial photographs, South Coast AQMD staff found that the nearest sensitive receptor (e.g., residence) is approximately 933 feet west/northwest of the Proposed Project. Construction of the Proposed Project is anticipated to last approximately 18 months.⁴

South Coast AQMD Staff's Comments

CEQA Localized Air Quality Impacts Analysis for Construction and Operation

In the Air Quality section of the MND, the Lead Agency summarizes the South Coast AQMD localized significant thresholds (LST) and presents them in Table 6-6.⁵ The Lead Agency reference the LSTs are based on the source receptor area (SRA) 26 – Temecula Valley for a 4-acre site at 25 meters.⁶ Although the nearest sensitive receptor (e.g., residence) is approximately 933 feet from the Proposed Project's site, as mentioned in the South Coast AQMD staff's summary, the Lead

¹ MND. Page 1.

² *Ibid.*

³ *Ibid.* Page 2.

⁴ *Ibid.* Page 30.

⁵ *Ibid.* Page 35.

⁶ *Ibid.*

Agency chooses the most stringent 25-meter thresholds for the analysis. However, different LSTs are utilized in Appendix B, such that the LSTs are based on SRA 28 – Hemet/San Jacinto Valley at a 2-acre site and 100 meters.⁷ Therefore, South Coast AQMD staff recommends that the Lead Agency revise the LST air quality analysis for construction and operation using consistent SRA, disturbed area acreage, and the most conservative receptor distance when re-analyzing this section and include them in the Final MND. If the revision is not included in the Final MND, the Lead Agency should provide reasons for not having it supported by substantial evidence in the record.

Construction Duration

In the Air Quality Section of the MND, the Lead Agency mentions that the construction is expected to last approximately 18 months beginning in the year 2020.⁸ On the other hand, the Project description in Appendix B shows a different timeframe, in which the construction is estimated to last approximately 15 months starting in the year 2021.⁹ South Coast AQMD staff recommends that the Lead Agency revise both the MND and Appendix B to have a consistent construction timeline when the schedule is finalized to avoid any inconsistency in the Final MND.

Responsible Agency and South Coast AQMD Permits

In the event that the Proposed Project or implementation of the Proposed Project requires the use of stationary equipment, permits from South Coast AQMD are required unless a written permit is not required.¹⁰ The Lead Agency should use good faith effort to include a discussion of equipment that will require South Coast AQMD permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project in the Final MND. If any activities involve using equipment that either emits or controls air pollution, the Lead Agency should consult with South Coast AQMD staff to determine whether or not permits or plans are required and approved by South Coast AQMD prior to the construction and operation. Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 or visit South Coast AQMD's web page for more general information on permits: <http://www.aqmd.gov/home/permits>.

Conclusion

According 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 the Lead Agency's position is at variance with recommendations raised in the comments, the issues raised in the comments should be addressed in detail, giving reasons why specific comments and suggestions are not accepted. There should be good faith and 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.

⁷ Appendix B. Page 5-2.

⁸ MND. Page 30.

⁹ Appendix B. Page 1-2.

¹⁰ South Coast AQMD. Rule 219. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/Rule-219.pdf>.

Evan Langan

November 9, 2022

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 Danica Nguyen, Air Quality Specialist, at dnguyen1@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

Sam Wang

Program Supervisor, CEQA-IGR

Planning, Rule Development, and Implementation

SW:DN

RVC221025-04

Control Number