



South Coast Air Quality Management District

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FAXED: AUGUST 2, 2005

August 2, 2005

Ms. Sandra Packham
Director of Facilities
Hemet Unified School District
2350 West Latham Avenue
Hemet, CA 92545

Dear Ms. Packham:

**Draft Mitigated Negative Declaration (DMND) for
Professional Development Center (July 2005)**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The SCAQMD also appreciates the additional time allowed by the lead agency for providing comments on the DMND for the proposed project. The following comments are meant as guidance for the Lead Agency. However, the SCAQMD requests that the Draft Mitigated Negative Declaration be revised and recirculated as explained in the attached comments.

Please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Mitigated Negative Declaration. The SCAQMD would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Charles Blankson, Ph.D., Air Quality Specialist – CEQA Section, at (909) 396-3304 if you have any questions regarding these comments.

Sincerely

Steve Smith, Ph.D.
Program Supervisor, CEQA Section
Planning, Rule Development & Area Sources

Attachment

SS: CB
RVC050712-03
Control Number

**Draft Mitigated Negative Declaration (DMND) for Professional
Development Center (July 2005)**

1. **Mitigation Measures:** The SCAQMD recommends that mitigation measure # 1 on page 32 be modified as follows: ...These limitations represent the maximum quantity of a single type of architectural coating that may be used on a daily basis if no other source is generating VOC emissions at the site. For example, no more than 90 gallons of flat coatings may be used per day, or no more than 60 gallons of non-flat coatings may be used per day; but not both. If other on-site sources are generating VOC emissions on days when painting is occurring, the project proponent's construction contractor shall further limit the application of flat or non-flat coatings to the extent necessary to ensure that VOC emissions from all sources do not exceed 75 pounds per day.

2. **Health Risk Assessment:** On page 34 of the DMND it is stated that 95 buses associated with the proposed project that emit diesel particulates would potentially result in a significant air quality impact prior to application of mitigation measures. Mitigation measure #2 on page 35 states, "A health risk study would be performed to characterize risk from buses associated with the project If substantial health risk impacts are found to occur, mitigation measures such as diesel particulate filters ... would be applied to reduce the health impacts to less than significant levels."

The SCAQMD believes that this approach taken by the lead agency regarding exposure to toxic air contaminants improperly defers to some undefined future date the quantification of a health risk assessment (HRA). Similarly, the lead agency improperly defers substantial mitigation measures such as particulate filters, etc., to some undefined future date. This precludes the public from reviewing and commenting on the HRA and proposed mitigation measures. Further, if the identified mitigation measures do not reduce potential significant adverse cancer risk impacts to less than significance, this impact has not been disclosed to the public and the public will have no recourse since the project will already have been approved.

The SCAQMD requests that the lead agency revise the DMND by performing an HRA for the proposed project, including the results in the DMND and, assuming impacts are not significant or can be mitigated to insignificance, recirculate the DMND for public review pursuant to CEQA Guidelines Section 15073.5.

The lead agency is referred to the methodology prepared by SCAQMD as guidance for performing an air toxics health risk analysis of truck emissions. This methodology can be accessed at the SCAQMD website at:

www.aqmd.gov/ceqa/handbook/diesel_analysis.doc under Health Risk Assessment Guidance. As noted by the lead agency, should the study disclose

adverse health risks to the nearby residents, the lead agency should identify measures to reduce those risks. If significant impacts cannot be mitigated to insignificance, the project does not qualify for a MND.

3. **Appendix B:** Please note there is a typographical error on page 31 of the DMND. The URBEMIS 2002 output printout is in Appendix B and not in Appendix A.