



South Coast Air Quality Management District

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FAXED: JUNE 29, 2005

June 29, 2005

Mr. Richard Masyczek
City of Hemet
445 East Florida Avenue
Hemet, CA 92543

Dear Mr. Richard Masyczek:

**Negative Declaration for Zone Change 04-12 / TPM 32700 / EA 04-46
(Wentworth Drive Complex, May 2005)**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. As a responsible agency with discretionary permitting authority over a portion of the project, the gas station component, the SCAQMD finds that there is no quantitative air quality information in the Negative Declaration on which the SCAQMD permit processor can rely when processing the permit applications for the gas station.

The SCAQMD requests that the lead agency revise the Negative Declaration to include quantitative air quality information and recirculate the document pursuant to CEQA Guidelines Section 15073.5. 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

RVC050610-02

Control Number

**Negative Declaration (ND) for Zone Change 04-12 / TPM 32700 / EA 04-46
(Wentworth Drive Complex)**

1. Project Air Quality Emissions: In response to the question whether the project will violate any air quality standard or contribute substantially to an existing or projected air quality violation, the lead agency states on page nine of the ND that "The proposed project would not cause a violation of any air quality standard or contribute substantially to an existing or projected air quality violation beyond what was anticipated and analyzed in the General Plan EIR." However, the ND does not include any data or other information from the General Plan EIR regarding air quality impacts for this specific project.

If the air quality impacts of this project were specifically analyzed in the General Plan EIR, it is recommended that the lead agency present the relevant information and tables in the ND discussion or attach the relevant excerpts in an appendix to the Final Negative Declaration. Alternatively, if the air quality impacts of this project were not specifically addressed in the General Plan EIR or the General Plan EIR is more than three years old, the lead agency should analyze potential emissions from construction and operation using the analysis methodologies in the SCAQMD 1993 CEQA Air Quality Handbook (Handbook) or other approved methodologies. Alternatively, the lead agency may consider using California Air Resources Board (CARB) computer model URBEMIS 2002 to estimate the project's construction and operational emissions. The model can be accessed at the SCAQMD website: www.aqmd.gov/ceqa/models.html.

2. Mobile Source Diesel Toxics Emissions: Appendix 2, Focused Traffic Evaluation, of the ND provides a detailed description of the proposed project and the two phases of project construction. Phase I will comprise the construction of a shopping center and restaurants in three buildings for a total of 66,090 sq. ft., and a gas station at the Northwest Corner. Phase II will see the development of two buildings consisting of 30,160 sq. ft. of shopping center, 12 building lots with a total of 31,200 sq. ft. of retail/wholesale warehouse and 30,780 sq. ft. of small manufacturing/warehouse at the Southwest Corner.

According to Table 2(b) in Appendix 2, the warehouses that would be built at the Southwest Corner of the property will generate 5,637 vehicle trips per day. The ND does not provide a breakdown of the vehicles (generating these vehicle trips) with respect to how many of them are medium heavy-duty or heavy heavy-duty diesel trucks. Depending on the truck routes and the distance to the nearest sensitive receptors, particulate emissions from the diesel-fueled trucks could potentially create significant adverse air toxics impacts. Without providing information on the breakdown or listing of the vehicles by vehicle type that would be servicing these warehouses at buildout, the lead agency cannot conclude that potential impacts from air toxics associated with the long-term use of diesel delivery trucks would be less than significant. SCAQMD staff recommends that the Final ND include a mobile source health risk assessment. Since the California Air Resources Board (CARB) designated particulate emissions from diesel-

fueled engines as a carcinogen in August 1998, the SCAQMD has prepared a methodology for performing an air toxics health risk analysis of truck emissions. This methodology can be accessed at the SCAQMD webpage at: http://www.aqmd.gov/ceqa/handbook/diesel_analysis.doc under Health Risk Assessment Guidance.

3. Stationary Source Toxic Analysis: To receive a permit from the SCAQMD, the gasoline station must undergo a health risk assessment (HRA) pursuant to SCAQMD Rule 1401 – New Source Review of Toxic Air Contaminants. The HRA should be performed specifically for the gas station component. If there is a substantial amount of heavy-duty diesel truck trips per day, overlapping cancer risks from the diesel trucks and the gasoline station should be identified.

4. Mitigation Measures: The lead agency states on page nine of the ND that, with the implementation of the policies contained in the General Plan and the Hemet Municipal code, impacts from the proposed project to air quality would be less than significant. Since the lead agency has not quantified the emissions from the construction and operation of the proposed project, and since the lead agency has not provided any information on the policies or measures outlined in the Hemet Municipal Code to reduce project emissions, SCAQMD staff cannot confirm the lead agency's conclusion that air quality impacts from the proposed project would be less than significant.

Since the air basin is currently designated as non-attainment for both the federal and state ozone, carbon monoxide and particulate matter (PM10) standards, it is important that the lead agency ensure the implementation of any measures which would help reduce any of these criteria pollutants, should the analysis determine any of them to be significant. The following measures are recommended for the lead agency to consider where applicable or feasible:

- Maintain equipment and vehicle engines in good condition and in proper tune as per manufacturers' specifications.
- Require the use of alternative clean fuel such as compressed natural gas-powered equipment with oxidation catalysts instead of diesel-powered engines, or if diesel equipment has to be used, use particulate filters, oxidation catalysts and low sulfur diesel as defined in AQMD Rule 431.2, i.e., with less than 15 ppm sulfur content.
- Trucks hauling dirt, sand, gravel or soil are to be covered or should maintain at least two feet of freeboard in accordance with Section 23114 of the California Vehicle Code.
- Pave parking areas and construction access roads to the main roads to avoid dirt being carried on to the roadway.
- Use alternative-fueled yard tractors.
- Restrict idling emissions by using auxiliary power units and electrification.
- Enforce truck parking restrictions.
- Restrict truck traffic on some routes.
- Provide a minimum of 300-meter buffer zone between truck traffic and sensitive receptors.

- Redirect truck route to avoid residential areas or schools.
- Improve traffic flow through signal synchronization.
- Provide electrical sources for service equipment and docking of trucks.
- Use light-colored roof materials to deflect heat.
- Install solar panels on roof to supply electricity for air conditioning.
- Use double-paned windows to reduce thermal loss.
- Install central water heating systems to reduce energy consumption, and
- Install energy-efficient appliances to reduce energy consumption.

Other mitigation measures for consideration by the lead agency can be found in Chapter 11 of the AQMD's Handbook.