South Coast
Air Quality Management District
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FAXED: SEPTEMBER 12, 2006 September 12, 2006

Ms. Sabrina Chavez, Project Planner
City of Perris
Department of Developmental Services/ Planning Division
135 "D" Street
Perris, CA 92570-2200

Draft Negative Declaration for Proposed Plan Review 05-0217

On July 7, 2006 the South Coast Air Quality Management District (SCAQMD) commented on the above-mentioned document and subsequent to that letter, further correspondence between the lead agency and the SCAQMD staff occurred to clarify information addressed in the SCAQMD's July 7, 2006 letter. The following comments address the additional information concerning the health risk assessment supplied by the Lead Agency and are meant as guidance for the Lead Agency. The comments should be incorporated into any California Environmental Quality Act document prepared for the proposed project.

This letter concludes the SCAQMD's review of the proposed project. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

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

Attachment

SS:GM

RVC060615-02
Control Number

Health Risk Assessment (HRA)

- Response to Comment #3

  The lead agencies consultant misunderstands SCAQMD's comment. SCAQMD staff did not mean to suggest that a trend line be extrapolated for the fleet years between 2041 and 2070. SCAQMD staff agrees that using a 2040 emission factor would be more conservative for years 2041 to 2070. However, SCAQMD staff suggests that after 2040, a more realistic emission factor would be a fleet mix of old and new vehicles for 2040 and not vehicles only made in 2040 as the analysis utilizes.

- Response to Comment #5

  The lead agencies consultant states that the input parameters were incorrect. Then, new parameters are presented that increase the stack inside diameter from three inches to 2.7 feet (0.82 meters). While the consultant uses as a reference the California Air Resources Board's (CARB) Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles, Appendix VII, October 2000, the largest stack inside diameter presented in the Appendix VII is 13 inches. In addition the parameters presented for stack sources in Appendix VII are for emergency and prime engines not mobile sources. A stack inside diameter of 2.7 feet is not realistic for a diesel truck. The HRA should be completed with realistic stack parameters and should include the correct reference.

- Since SCAQMD staff finds that neither the emission factor nor the stack parameters provided by the lead agencies consultant to be realistic, it is not clear if the significance conclusions are valid. The final CEQA document should be corrected to reflect more realistic emission factors and stack parameters, and the significance conclusions should be re-evaluated based on these values.