



South Coast  
Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182  
(909) 396-2000 • www.aqmd.gov

**FAXED: OCTOBER 26, 2007**

October 26, 2007

Mr. Ernest A. Egger  
City of Beaumont  
Planning Department  
550 East Sixth Street  
Beaumont, CA 92223

Dear Mr. Egger:

**Mitigated Negative Declaration (MND) for**  
**Hidden Canyon II Project**  
(September 2007)

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated in the Final Mitigated Negative Declaration.

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 available 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  
Planning, Rule Development & Area Sources

Attachment

SS: CB

RVC070927-01  
Control Number

**Mitigated Negative Declaration (MND) for the  
Hidden Canyon II Project**

**Project Emissions**

The lead agency states on pages 3-7 and 3-8 of the MND that the proposed project “is not expected to result in significantly increased emissions,” and that “the project is not expected to result in construction-related air quality threshold exceedances not already analyzed within the General Plan Update EIR.” The document provided by the lead agency is the General Plan, not the General Plan EIR. Review of the areas covered by the General Plan Update and the location of the proposed project in the MND shows that the proposed project is located outside of the areas covered by the General Plan and, therefore, is outside the scope of the analysis in the General Plan Update EIR. In fact, part of the project involves annexation of 89 acres, which includes the proposed project, currently in Riverside County into the City of Beaumont. As a result, the proposed project is not included within the scope of the analysis in the EIR for the General Plan Update.

Review of the MND indicates that the lead agency provides no data on the type and number of heavy-duty construction equipment that would be used for grading and construction. There is also no information on the number of vehicle trips and distance (mileage) covered for construction workers and construction materials and supplies that would be used for project construction. The lead agency provides no information on emission factors for these emission sources and how much emissions would be generated by these activities. Similarly, the lead agency has not quantified operational emissions from the proposed project.

Please note that without quantifying the proposed project’s air quality impacts, the lead agency has not demonstrated that the proposed project’s air quality impacts are not significant. To calculate potential adverse air quality impacts from the proposed project, the SCAQMD recommends that the lead agency use either the emissions calculation methodologies in the 1993 SCAQMD CEQA Air Quality Handbook or use the current version of the California Air Resources Board (CARB)-approved computer model URBEMIS 2007, which is available at the following website: [www.urbemis.com](http://www.urbemis.com).

**Localized Significance Thresholds**

Consistent with the SCAQMD’s environmental justice program and policies, the SCAQMD recommends that the lead agency also evaluate localized air quality impacts to nearby sensitive receptors. SCAQMD staff recommends that for this project and for future projects, the lead agency undertake the localized analysis to ensure that all feasible measures are implemented to protect the health of nearby sensitive receptors. The methodology for conducting the localized significance

thresholds analysis can be found on the SCAQMD website at:  
[www.aqmd.gov/ceqa/handbook/LST/LST.html](http://www.aqmd.gov/ceqa/handbook/LST/LST.html).

Note that localized Impacts analysis should be done for both construction and operation and there are two corresponding look-up tables for that as well.

### **Diesel Truck Emissions**

The proposed project includes 49 acres of general commercial and retail uses. If any of the commercial or retail uses involve heavy-duty trucks, a mobile source health risk assessment (HRA) might need to be prepared because trucks are a substantial source of diesel particulates. With the designation of diesel particulates as a carcinogen by the California Air Resources Board (CARB), the health impacts of diesel particulates from the proposed project's truck traffic need to be assessed. The SCAQMD has prepared a methodology for performing an air toxics health risk analysis for truck emissions. This methodology can be accessed at the SCAQMD website at: [www.aqmd.gov/ceqa/handbook/diesel\\_analysis.doc](http://www.aqmd.gov/ceqa/handbook/diesel_analysis.doc) under Health Risk Assessment Guidance.

### **Project Mitigation:**

In the event that quantification of the construction and operational air quality impacts exceed any of the applicable significance thresholds recommended for use by the SCAQMD, SCAQMD staff recommends that the lead agency identify specific feasible mitigation measures, rather than the vague mitigation measures AQ-1 and AQ-2 on pages 3-8 and 3-9, respectively. Sample mitigation measures can be found in Chapter 11 of the SCAQMD's Handbook or on the SCAQMD's CEQA webpages at: [www.aqmd.gov/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/handbook/mitigation/MM_intro.html).