



# South Coast Air Quality Management District

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June 16<sup>th</sup>, 2015

Mr. Brad Johnson, Development Services Manager  
City of Pomona, Planning Division  
505 South Garvey Ave.,  
Pomona, CA 91766

## **Draft Mitigated Negative Declaration (DMND) 9<sup>th</sup> Street and East End Avenue Warehouse**

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 into the Final CEQA document.

In the project description, the Lead Agency proposes the construction a 197,500 square foot speculative warehouse building on a 9.43 acre site. The Lead Agency has projected at least 126 daily truck trips operating at the site. In the Air Quality Section, the Lead Agency quantified the project's construction and operation air quality impacts and has compared those impacts with the SCAQMD's recommended regional and localized daily significance thresholds. Based on its analyses, the Lead Agency has determined that construction and operation air quality impacts will not exceed the significance thresholds.

The SCAQMD staff is concerned that the existing sensitive receptors will be exposed to significant regional and localized operational impacts, mostly from the daily truck activities that will likely operate using diesel fuel. Based on information in the DMND (air quality analyses, the project truck distribution, or by aerial map inspection), the Lead Agency shows a minimum distance of 10 meters to the nearest sensitive receptor; residences and schools located along the truck routes. As a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land-use decision making process, the California Air Resources Board (CARB) has provided the CARB Air Quality and Land Use Handbook (CARB Land Use Handbook). Based on guidance from the CARB Land Use Handbook, CARB recommends a buffer of at least 1,000 feet between land uses that will have 100 or more trucks per day.<sup>1</sup>

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<sup>1</sup> CARB Air Quality and Land Use Handbook: <http://www.arb.ca.gov/ch/handbook.pdf>

Although approved as designated truck routes in the Lead Agency's Circulation Element in its General Plan, project truck traffic will pass by sensitive receptors daily using Holt Ave., S. Mills Ave., and Reservoir St., to access the Interstate 10, Interstate 60 Freeway, and State Route 71. The SCAQMD staff therefore recommends that the Lead Agency conduct a mobile source health risk assessment (HRA)<sup>2</sup> to disclose the potential health risks to the residents from vehicles that use the truck routes. In accordance with the state CEQA Guidelines §15126.4 (a)(1)(D), the Lead Agency should discuss the proposed siting of this land use and any potential impacts resulting from any proposed mitigation related to the CARB Land Use Handbook guidance in the Final EIR.

Pursuant to Public Resources Code Section 21092.5, SCAQMD staff requests that the Lead Agency provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. Further, staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Jack Cheng, Air Quality Specialist, at (909) 396-2448, if you have any questions regarding the enclosed comments.

Sincerely,

*Jillian Wong*

Jillian Wong, Ph.D.

Program Supervisor

Planning, Rule Development & Area Sources

Attachment

JW:JC

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Control Number

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<sup>2</sup> "Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis"  
Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>