South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:
rgonzalez@jurupavalley.org

October 27, 2026

Roberto Gonzalez, AICP
City of Jurupa Valley
Community Development Department
8930 Limonite Avenue
Jurupa Valley, CA 92509

Draft Mitigated Negative Declaration (MND) for the Jurupa Hills Post Acute Care Facility Project - Master Application (MA) No. 24229 (Proposed Project) (SCH No.: 2026100721)

South Coast Air Quality Management District (South Coast AQMD) Staff appreciate the opportunity to review the above-mentioned document. The City of Jurupa Valley is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD Staff have provided a brief summary of the project information and prepared the following comments which are organized by topic of concern.

Summary of Proposed Project Information in the Draft MND

Based on the Draft MND, the Proposed Project involves a Change of Zone from Rural Residential to General Residential to facilitate the development of a 42,000-square-foot skilled nursing facility and a 9,100-square-foot medical office facility on two parcels totaling approximately 4.55 acres. The project also includes a Tentative Tract Map to subdivide approximately 14.61 acres into three parcels and one lot, while the existing Jurupa Hills Acute Care Facility would remain on a separate 3.16-acre parcel. Based on a review of aerial photographs, South Coast AQMD Staff found that the nearest sensitive receptor (e.g., existing skilled nursing facility) is located directly adjacent to the project site. The Proposed Project is located at 6401 33rd Street in Jurupa Valley. [1]

South Coast AQMD Comments

Evaluation of Localized Operational Air Quality Impacts and Potential Health Risks

The Proposed Project includes a 500-kW emergency generator, and the air quality analysis references South Coast AQMD guidance regarding emergency diesel engines and assumes generator operation of up to 200 hours per year. However, the analysis in the Draft MND does not appear to include a project-specific health risk assessment (HRA) evaluating potential cancer associated with toxic air contaminant emissions from the generator. Given the proximity of an existing skilled nursing facility, whose residents may be particularly sensitive to air pollution exposure, the Lead Agency should clarify the generator's fuel type, operating condition, and

[1] Drat MND. Page 7.

evaluate whether an project-specific HRA is warranted to assess potential health risks to nearby sensitive receptor.

Additionally, the air quality analysis does not include a quantitative localized significance threshold (LST) analysis for evaluating local air quality impacts during operation. Instead, the Lead Agency concludes that localized operational air quality impacts would be less than significant based on assumptions regarding vehicle idling and stationary-source emissions. Given the proposed emergency generator and the proximity of the adjacent skilled nursing facility, the Lead Agency is encouraged to provide a quantitative operational LST screening analysis or site specific modeling analysis to further substantiate its less-than-significant local air quality impact conclusion.

Therefore, it is recommended that the Lead Agency clarify the proposed emergency generator's fuel type and evaluate whether a project-specific HRA is warranted to assess potential cancer and non-cancer health risks to nearby sensitive receptors. The Lead Agency is also encouraged to estimate maximum daily on-site operational emissions from the emergency generator and other applicable stationary sources and compare them against the applicable SCAQMD LST screening thresholds, considering the appropriate source-receptor area, screening parameters, and distance to the adjacent skilled nursing facility. If the Lead Agency determines that either analysis is unnecessary, it should provide the technical justification and supporting evidence for that determination.

South Coast AQMD Air Permits and Role as a Responsible Agency

If implementation of the Proposed Project would require the use of new stationary and portable sources, including but not limited to emergency generators, fire water pumps, boilers, etc., air permits from South Coast AQMD will be required. The Final MND should include a discussion about the potentially applicable South Coast AQMD rules that may be applicable to the Proposed Project. Those rules may include, for example, Rule 201 – Permit to Construct,[2] Rule 203 – Permit to Operate,[3] Rule 401 – Visible Emissions,[4] Rule 402 – Nuisance,[5] Rule 403 – Fugitive Dust,[6] Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,[7] Rule 1113 – Architectural Coatings,[8] Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil,[9] Regulation XIII – New Source Review,[10] Rule 1401 – New Source Review of Toxic Air Contaminants,[11] Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants,[12] Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines,[13] etc. It is important to note if air permits from South Coast AQMD are required, the role of South Coast AQMD would change from a Commenting Agency

[2] South Coast AQMD, Rule 201 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf
[3] South Coast AQMD, Rule 203 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf
[4] South Coast AQMD, Rule 401 is available at: https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf
[5] South Coast AQMD, Rule 402 is available at: https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf
[6] South Coast AQMD, Rule 403 is available at: https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403
[7] South Coast AQMD, Rule 1110.2 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf
[8] South Coast AQMD, Rule 1113 is available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf
[9] South Coast AQMD, Rule 1166 isa vailable at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf
[10] South Coast AQMD, Regulation XIII is available at: https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiii
[11] South Coast AQMD, Rule 1401 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf
[12] South Coast AQMD, Rule 1466 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf
[13] South Coast AQMD, Rule 1470 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf

to a Responsible Agency under CEQA. In addition, if South Coast AQMD is identified as a Responsible Agency, per CEQA Guidelines Sections 15086, the Lead Agency is required to consult with South Coast AQMD.

CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of the process for conducting a review of the Proposed Project and issuing discretionary approvals. Moreover, it is important to note that if a Responsible Agency determines that a CEQA document is not adequate to rely upon for its discretionary approvals, the Responsible Agency must take further actions listed in CEQA Guideline Section 15096(e), which could have the effect of delaying the implementation of the Proposed Project. In its role as CEQA Responsible Agency, the South Coast AQMD is obligated to ensure that the CEQA document prepared for this Proposed Project contains a sufficient project description and analysis to be relied upon in order to issue any discretionary approvals that may be needed for air permits. South Coast AQMD is concerned that the project description and analysis in its current form in the MND is inadequate to be relied upon for this purpose.

For these reasons, the final CEQA document should be revised to include a discussion about any and all new stationary and portable equipment requiring South Coast AQMD air permits, provide the evaluation of their air quality and greenhouse gas impacts, and identify South Coast AQMD as a Responsible Agency for the Proposed Project as this information will be relied upon as the basis for the permit conditions and emission limits for the air permit(s). Please contact South Coast AQMD's Engineering and Permitting Staff at (909) 396-3385 for questions regarding what types of equipment would require air permits. For more general information on permits, please visit South Coast AQMD's webpage at https://www.aqmd.gov/home/permits.

Conclusion

The Lead Agency is recommended to revise the CEQA analysis to address the aforementioned comments and provide the necessary evidence to sufficiently support the conclusions reached. If the requested information and analysis are not included in the final CEQA document, either the Final MND or other type of CEQA document, the Lead Agency should provide reasons for not doing so. Pursuant to California Public Resources Code Section 21092.5(b) and CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process and notify each public agency when any public hearings are scheduled. Please provide South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided. In addition, if the Lead Agency decides to adopt the Final MND, please provide South Coast AQMD with a notice of any scheduled public hearing(s).

South Coast AQMD staff are available to work with the Lead Agency to ensure that impacts to air quality, GHG emissions, and health risk from the Proposed Project are accurately evaluated and mitigated to the greatest extent possible. Please contact Sahar Ghadimi, Ph.D., Air Quality Specialist, at sghadimi@aqmd.gov or me at SWang1@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

Sam Wang
Program Supervisor, CEQA IGR
Planning, Rule Development & Implementation

RVC261006-05
SW:SG
Control Number