



South Coast Air Quality Management District

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E-MAILED: JULY 28, 2010

July 28, 2010

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**Draft Mitigated Negative Declaration (Draft MND) for the Proposed Public Works
Administration Building and Household Hazardous Waste Facility (DRC2009-
00882)**

The South Coast Air Quality Management District (AQMD) 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 Mitigated Negative Declaration (MND).

In the Draft MND in Section 3 Air Quality, the lead agency did not prepare a project-specific air quality analysis. Instead, the lead agency relies on conclusions from the previously prepared Final EIR for the City of Rancho Cucamonga General Plan (GP) certified in October 2001. It is not clear from the discussion in the Draft MND, whether the 2001 Final EIR for the City's General Plan specifically analyzed the construction and operational air quality impacts of the proposed 27,879 square foot Public Works Administration building and the 2,736 square foot Household Hazardous Waste Facility buildings totaling 30,615 square feet on the 6.65-acre industrial property.

AQMD staff understands that CEQA Guidelines §15150 allow a lead agency to incorporate into their document information from another document, however, CEQA Guidelines §15150(c) also requires a summary of the information from the referenced document. If this specific project was analyzed in the 2001 Final EIR, the lead agency should have included quantitative results of the construction and operational analysis of the referenced Final EIR. Without this quantitative information, the lead agency has not demonstrated that air quality impacts from this project are insignificant.

Even if this specific project was analyzed in the 2001 Final EIR, that information is out of date because: 1) the Draft MND relies on the 2001 GP, however, the GP was updated in 2010; and 2) subsequent to 2001, the EMFAC on-road mobile source emission factors model developed by the California Air Resources Board (CARB) has been substantially revised. The most recent upgrade (EMFAC2007) substantially increased the on-road mobile source emission factors so it is likely that mobile source emissions from the 2001 Final EIR for the General Plan are underestimated. Therefore, the lead agency should

quantitatively reanalyze construction and operation impacts from the proposed project. Until this is done, the lead agency has not demonstrated that air quality impacts are not significant.

In order to evaluate the proposed project's construction and operation emission impacts, the lead agency can utilize the current¹ URBEMIS 2007 emissions model. This model uses on-road mobile source emission factors from the EMFAC 2007 model, which is the most current model approved for use by CARB. Alternatively, the lead agency could use the calculation methodologies in Chapter 9 and the Appendix to Chapter 9 in the AQMD's CEQA Air Quality Handbook.

In the Final MND, please provide a summary or table showing the projected emissions and supporting documentation, including the assumptions, methodologies, equations, emission factors or output sheets from any modeling performed and any changes to the model inputs.

In addition to evaluating the above-mentioned air quality impacts, the AQMD recommends that the lead agency estimate localized air quality impacts to ensure that any nearby sensitive receptors are not adversely affected by the construction activities that are occurring in close proximity. Although the lead agency states on page 4 of Part I of the Draft MND that the surrounding land uses are all industrial, an aerial map inspection shows that the proposed project is located within one-quarter mile of sensitive receptors (residential properties) southwest of the proposed project. SCAQMD guidance for performing a localized air quality analysis can be found on the AQMD web page.¹ Should the lead agency conclude after its analyses that construction or operational localized air quality impacts exceed the SCAQMD daily significance thresholds, potential mitigation measures are available in addition to those measures listed on Pages 5-6 in Part II of the Draft MND that can be implemented if the air quality impacts are determined to be significant.³

Please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. The AQMD staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,



Ian MacMillan
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Planning, Rule Development & Area Sources

¹ <http://www.urbemis.com/>

² <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>

³ http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html