



# South Coast Air Quality Management District

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## **Review of the Draft Environmental Impact (Draft EIR) for the Proposed Loma Linda University Health Master Plan Project**

The South Coast Air Quality Management District (SCAQMD) staff 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 environmental impact report (final EIR) as appropriate.

Based on a review of the Draft MND the proposed project will require construction and operational activity in close proximity to sensitive land uses<sup>1</sup> (e.g., residential land uses). However, it does not appear that the Lead Agency has quantified the potential localized air quality impacts from this construction and operational activity. As a result, SCAQMD staff is concerned about potential localized air quality impacts to sensitive receptors that surround the project site (for example, residential units located adjacent to the eastern and western boundary of the project site). Further, SCAQMD staff is concerned about the potential greenhouse gas (GHG) impacts from operation of the proposed project. Therefore, the SCAQMD staff recommends that the Lead Agency quantify the project's localized construction air quality impacts and compare the results to the SCAQMD's California Environmental Quality Act (CEQA) construction significance thresholds. Also, the SCAQMD staff recommends that the Lead Agency incorporate additional mitigation to minimize the project's GHG impacts pursuant to Section 15126.4 of the CEQA Guidelines and provide additional discussion regarding the operational equipment requirements (e.g., stationary source equipment and emissions controls requiring SCAQMD permits) for the proposed project.

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<sup>1</sup> California Air Resources Board. April 2005. "Air Quality and Land Use Handbook: A Community Health Perspective." Accessed at: <http://www.arb.ca.gov/ch/landuse.htm>

### Guidance for Performing a Localized Construction and Operational Air Quality Analysis

The Lead Agency should use the localized significance thresholds to determine air quality impacts in the immediate vicinity. Therefore, when revising the air quality analysis for the proposed project, it is recommended that the Lead Agency perform a localized significance analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for performing localized and regional air quality analyses can be found at: <http://www.aqmd.gov/ceqa/hdbk.html>

### Air Quality and GHG Mitigation Measures

In the event that the Lead Agency finds any significant localized air quality impacts from the proposed project the SCAQMD staff recommends that the Lead Agency provide additional mitigation measures to minimize the project's significant localized construction and operational air quality impacts pursuant to Section 15126.4 of the CEQA Guidelines. A list of potential construction related air quality mitigation measures is available at: [http://www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html)

Further, the Lead Agency determined that the project will result in significant GHG impacts; therefore, the SCAQMD staff recommends that the following mitigation measures be included in the final EIR pursuant to Section 15126.4 of the CEQA Guidelines.

### Additional Operational GHG Mitigation Measures – Transportation

- a) Provide electric car charging stations for tenants. Also, provide designated areas for parking of zero emission vehicles (ZEVs) for car-sharing programs.
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- c) Provide incentives for employees and the public to use public transportation such as discounted transit passes and/or other incentives.
- d) Create local “light vehicle” networks, such as neighborhood electric vehicle (NEV) systems.
- e) Require the use of 2010 compliant diesel trucks, or alternatively fueled, delivery trucks (e.g., food, retail and vendor supply delivery trucks) at commercial/retail sites upon project build-out. If this isn't feasible, consider other measures such as incentives, phase-in schedules for clean trucks, etc.

### Additional Operational GHG Mitigation Measures - Other

- f) Require use of electric lawn mowers and leaf blowers.
- g) Require use of electric or alternatively fueled sweepers with HEPA filters.
- h) Require the use of electric or alternative fueled maintenance vehicles.

### SCAQMD Permits

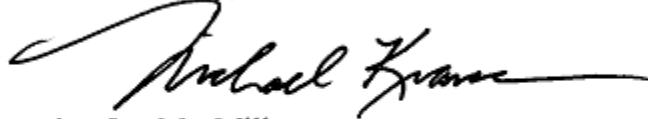
The proposed project includes an upgraded cogeneration power plant that requires SCAQMD permits. Therefore, SCAQMD staff recommends that the final EIR include

additional discussion regarding the permits and emissions controls required for the proposed project. For example, the final EIR should elaborate on the storage and transfer of ammonia in the event that it will be used for emissions control equipment.

Contact Information

SCAQMD staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Ian MacMillan", written in a cursive style.

*for* Ian MacMillan  
Program Supervisor, Inter-Governmental Review  
Planning, Rule Development & Area Sources

Attachment

[MK:DG](#)

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