



## South Coast Air Quality Management District

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E-MAILED: APRIL 15, 2010

April 15, 2010

Mr. Michael E. Story, Director  
Development Services Department  
City of Rialto  
150 South Palm Avenue  
Rialto, CA 92376

### **Draft Environmental Impact Report (Draft EIR) for the Proposed Lytle Creek Ranch Specific Plan (LCRSP)**

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 Environmental Impact Report.

AQMD staff is concerned that the lead agency is considering creating potentially incompatible land uses but has not adequately disclosed to the public the air quality impacts and health risks in the Draft EIR. Further, there is no commitment to perform additional air quality analyses pursuant to CEQA for projects contained within the LCRSP. Hence, it is the AQMD staff's understanding that the proposed overlay uses and their air quality impacts on residences and other sensitive receptors could be waived at the discretion of the lead agency and ultimately, not performed. The potential land uses in the proposed overlay may have serious air quality and health impacts depending on how they are designed and their proximity to sensitive receptors. The AQMD's staff strongly cautions the lead agency on siting toxic emitting industrial sources such as metal plating facilities, warehouses, and distribution centers in close proximity to residents and other sensitive receptors.

The AQMD staff encourages the lead agency to consider implementing the recommended distances described in the California Air Resources Board Air Quality and Land Use Guidelines Handbook in this initial planning stage to further protect those residences and other sensitive receptors from adverse air quality and health effect from the off-site sources and the proposed overlay uses. As required under CEQA, the AQMD staff recommends that the lead agency commit to quantitatively evaluating and disclosing air quality impacts, including health risks, from the proposed overlay land uses.

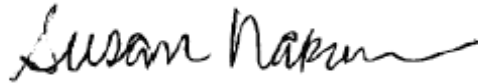
Pursuant to Public Resources Code Section 21092.5, please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final Environmental Impact Report. The AQMD staff is available to work with the Lead

Mr. Michael E. Story,  
Director

April 15, 2010

Agency to address these issues and any other questions that may arise. Please contact Ian MacMillan, Program Supervisor – Inter-Governmental Review, at (909) 396-3244, if you have any questions regarding these comments.

Sincerely,

A handwritten signature in black ink that reads "Susan Nakamura". The signature is fluid and cursive, with a long horizontal flourish at the end.

Susan Nakamura  
Planning and Rules Manager  
Planning, Rule Development & Area Sources

Attachment

SN:IM:JK:GM

LAC100302-06  
Control Number

### **Future Project Construction/Operation Air Quality Analyses**

1. As described in the Draft EIR, the LCRSP includes four residential neighborhoods totaling approximately 8,407 dwelling units on about 939.4 acres, with approximately 19.5 acres of commercial uses, and other non-residential development on an additional 95.6 acres. Besides these proposed land uses, the lead agency also proposes alternative land uses that could be sited within the underlying project areas including the Village Center Commercial Overlay (VCO) and the General Warehouse Overlay (GWO). These overlay zones would allow for land uses with the potential for toxic air emissions including gasoline service stations, automobile repair shops, welding, machine and metal plating shops, manufacture and assembly facilities, research and development facilities, printing and blueprinting shops, warehouse and distribution centers and other similar uses described on page 4.7-76 of the Draft EIR.

The lead agency states that these alternative land uses could be permitted or conditionally permitted and sited in close proximity to residential or other sensitive receptors without future CEQA review. The lead agency also concludes that the juxtaposition of these incompatible land use types could create significant air quality impacts including carcinogenic health risks from sources such as diesel trucks from warehouse operations, quarrying, and other industrial uses. However, the lead agency does not quantify these potential health risks of these overlay zones in the Draft EIR. Instead, the lead agency concludes in Table 4.1-4 (page 4.1-106) and Mitigation Measure 1-1 (pages 4.201 and 4.202) that these project impacts could be analyzed at a future date at the discretion of the lead agency, yet project analyses could be waived on a case by case basis. This creates uncertainty that potentially significant impacts would not be analyzed and disclosed for projects within the overlay zones.

Based on CEQA Guidelines §15151 (Adequacy), §15152 (Tiering) and §15126.6(d) (Alternatives), AQMD staff believes that the analysis of these alternative project impacts should not be discretionary. The lead agency should commit to quantifying and presenting to the public the magnitude of impacts due to these overlay zones either in the Final EIR or in subsequent project-specific CEQA documents.

2. The Draft EIR states that future industrial development within the LCRSP area may be approved at the discretion of the lead agency, potentially without CEQA review. As the air quality analysis presented in this Draft EIR is not sufficient to cover AQMD permitting requirements for new sources of emissions subject to AQMD rules, the lead agency should clarify in the Final EIR that all new permitted sources of emissions will require additional CEQA analysis prior to construction or operation.

### **Localized Significance Thresholds**

3. As noted in Table 4.712 (page 4.7-67) of the Draft EIR, the lead agency estimated localized significance impacts from construction based on the underlying land uses stated in the project description but did not estimate localized construction or operation air quality impacts for the overlay land uses (see also comment #1). The Draft EIR states on pages 4.7-76 and 4.7-79 that the proposed project allows the lead

agency to authorize land uses with potentially significant emissions such as warehouse distribution centers, light and medium industrial facility uses, metal plating facilities, etc. as approved permitted or conditionally permitted uses within portions of the proposed project area. Because the proposed project is located within one-quarter mile of sensitive receptors (residential properties) west, southwest, and southeast of the proposed project, the AQMD requests that the lead agency evaluate localized air quality impacts for both the underlying and overlay project uses to ensure that any nearby sensitive receptors are not adversely affected by the construction and operational activities that are occurring in close proximity. AQMD guidance for performing a localized air quality analysis can be found at the following web address: <http://www.aqmd.gov/ceqa/handbook/LST/LST.html> .

### **Operational Mitigation Measures**

4. Because the lead agency has determined that project operational air quality impacts have exceeded the AQMD recommended daily significance thresholds for VOC, NO<sub>x</sub>, CO, PM<sub>10</sub> and PM<sub>2.5</sub> and that cancer risks exceed the AQMD significance threshold of 10 in one million ( $10 \times 10^{-6}$ ), the AQMD staff recommends the following modifications and additions to further reduce operational and cancer risks, if applicable and feasible:

Proposed changes:

Mitigation Measure 7-17 requires the installation of air filtration systems meeting specified performance standards on all residential dwelling units located within a 500-foot distance of the I-15 Freeway right-of-way, the CEMEX USA quarry and the Vulcan Materials Company plant.

For Mitigation Measure 7-17, the AQMD recommends that the lead agency include language that will describe enforceability and monitoring in the Final EIR. It is not clear who is responsible for the air filtration systems and how the systems will be serviced to ensure mitigation will continue to protect the health of the new and future residents and other sensitive receptors located within 500 feet of the aforementioned emission sources over time.

Additional Measures:

Mitigation Measure 7-18 prohibits the placement of public recreational uses within 500 feet of the I-15 freeway, a quarry, and a rock processing plant. The AQMD also recommends that the lead agency consider implementing recommendations from the CARB Air Quality and Land Use Handbook Guidelines (<http://www.arb.ca.gov/ch/landuse.htm>) when developing any sensitive receptors such as residences, hospitals, convalescent homes, day-care centers, and schools. These include:

- a 500-foot buffer from the I-15 Freeway right-of-way, the CEMEX USA quarry and the Vulcan Materials Company plant according to CARB guidance, which could be implemented similar to the setback proposed in Mitigation Measure 7-18. This could be done as a deed restriction prohibiting the establishment of sensitive receptor development within the 500 foot distance.
  - a 1,000 foot buffer from warehouse distribution centers (that accommodates more than 100 trucks per day, more than 40 trucks with operating TRUs [Transport Refrigeration Units] per day, or where TRU unit operations exceed 300 hours per week);
  - a 300 foot buffer from large gasoline dispensing facilities;
  - a 50 foot buffer from typical gasoline stations; and
  - a 500 foot buffer from a dry cleaning facility that operates two or more machines (utilizing ‘perc’) or within 300 feet of a dry cleaning facility that has fewer than two machines.
5. On page 4.7-76 in Section 4.7: Air Quality, the lead agency authorizes warehouse distribution center land uses as part of the General Warehouse Overlay. Therefore, the AQMD recommends that the lead agency review additional recommendations that pertain to new warehouse distribution centers. A copy of the Western Riverside Council of Governments (WRCOG) "Good Neighbor Guidelines for Siting New and/or Modified Warehouse/Distribution Facilities" is available directly from WRCOG and is also available on the AQMD's website at: <http://www.aqmd.gov/ceqa/hdbk.html>. The Guidelines were developed through the WRCOG's Regional Air Quality Task Force. The objective of the Guidelines is to provide local governments and developers with a menu of options of strategies that can reduce exposure to diesel particulate from new and/or modified warehouse or distribution centers. The Guidelines include seven goals, and a variety of strategies for each goal that can be implemented in whole or part. There are a variety of benefits associated with adopting the guidelines, such as reducing the exposure of residents and sensitive receptors to diesel emissions.
6. Recommendations for Truck Idling Facilities:
- Take into account the configuration of the proposed distribution centers and avoid residences and other sensitive land uses from being located near entry and exit points; and
  - Provide a minimum buffer zone of 300 meters (roughly 1,000 feet) between truck traffic and sensitive receptors;
  - Re-route truck traffic by adding direct off-ramps for the truck traffic or by restricting truck traffic on certain sensitive routes;
  - Improve traffic flow by signal synchronization;
  - Enforce truck parking restrictions;
  - Develop park and ride programs;
  - Restrict truck idling;
  - Restrict operations to “clean trucks,” such as a 2007 or newer model year or 2010 compliant vehicles;

Mr. Michael E. Story,  
Director

April 15, 2010

- Provide electrical hook-ups for trucks that need to cool their load;
- Electrify auxiliary power units;
- Use ‘clean’ street sweepers;
- Pave roads and road shoulders;
- Provide onsite services to minimize truck traffic in or near residential areas, including, but not limited to, the following services: meal or cafeteria service, automated teller machines, etc.;
- Require or provide incentives to use low-sulfur diesel fuel with particulate traps; and
- Conduct air quality monitoring at sensitive receptors.