



South Coast Air Quality Management District

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Review of the Final Environmental Impact Report (Draft EIR) for the Renaissance Specific Plan Project

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above mentioned project. The following comments are intended to provide guidance to the lead agency and should be incorporated into the final Environmental Impact Report (EIR) as appropriate.

On September 22, 2010 the AQMD staff provided the lead agency with comments on the draft EIR for the proposed project. Specifically, AQMD staff requested that the lead agency incorporate the following into the final EIR: a revised health risk assessment (HRA) and localized significance threshold analysis that accounts for the nearest sensitive receptors and additional mitigation measures to reduce air quality impacts from the project's construction and operational activities. In response, the lead agency revised the draft EIR including mitigation measures consistent with the Air Quality and Land Use Handbook published by the California Air Resources Board's (CARB) to minimize the project's health risk impacts. However, the AQMD staff is concerned about the limited mitigation proposed by the lead agency to address the project's regional air quality impacts in the final EIR.

In the final EIR the lead agency states that mitigation measures recommended by AQMD staff specific to off-road diesel construction equipment and on-road diesel trucks are not within the city's authority. Specifically, the lead agency indicates that the city does not have the authority to require emissions standards from off-road construction equipment and on-road diesel trucks. AQMD staff concurs with this statement; however, in accordance with Section 15041 of the CEQA Guidelines the lead agency has the authority to require feasible mitigation measures including measures that restrict the project's construction activity to equipment that meets higher tiered emissions standards

than required by CARB. Further, AQMD staff would like to note that other projects in the region have found similar mitigation measures to be feasible given that construction equipment with higher tiered emissions standards is available. Therefore, AQMD staff strongly recommends that the lead agency provide additional mitigation measures in the final EIR consistent with AQMD staff's previous comments (dated September 22, 2010) intended to reduce the project's significant air quality impacts.

AQMD staff is available to work with the lead agency to address these air quality 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,



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

Attachment

IM:DG

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