



**South Coast
Air Quality Management District**
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**Draft Environmental Impact Report for the Proposed
Rancho Palma Development Project**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. 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.

The proposed Project is the construction of 120 single family homes. The Project is approximately 80 feet northeast of Interstate 215. The lead agency quantified the project's construction and operation air quality impacts and has compared those impacts with the SCAQMD's recommended regional and localized daily significance thresholds. Based on its analyses, the lead agency has determined that construction and operational air quality impacts are less than significant.

The lead agency also conducted a Health Risk Assessment (HRA) to determine the long-term air quality impacts from vehicles operating on the Interstate 215 to the future residents. The HRA found that maximum cancer risk from the freeway is 8.91 in one million, which is less than the SCAQMD significance threshold of 10 in one million. The SCAQMD staff has concerns about the assumptions used in the modeling, which likely underestimates the health risks.

The HRA analysis used separate discrete receptors placed in residential areas. Receptors should be placed at the boundaries of the residential property and not the location of the residential structure. Residents are still exposed to pollutants while outside of their homes, e.g. children playing outdoors, around a pool area, residents relaxing or walking outside, working outside on a balcony, cleaning a vehicle, etc. SCAQMD staff recommends that the lead agency revise the HRA using appropriate locations.

Additionally, SCAQMD staff recommends that the Lead Agency revise the HRA to include a receptor grid of no more than 100-meter spacing over the existing residences and areas zoned or planned for residential development, in order to ensure that the maximum impacts to a residential receptor are properly analyzed.

SCAQMD staff observed a rail line southwest of the proposed Project. By not including emissions for the rail line source in the HRA, cancer risk impacts are likely underestimated. SCAQMD staff recommends that the lead agency update the HRA to include emissions from the rail line.

The SCAQMD staff is available to work with the Lead Agency to address these concerns and any other air quality questions that may arise. Please contact Jack Cheng, Air Quality Specialist at (909) 396-2448, if you have any questions regarding these comments. We look forward to reviewing and providing comments for the Final EIR associated with this project.

Sincerely,

Jillian Wong

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