



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Mitigated Negative Declaration (MND) for the Proposed Land Acquisition and Site Improvement Project at the Lamb Canyon Landfill

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comment is meant as guidance for the Lead Agency and should be incorporated into the Final MND.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to acquire ownership of approximately 70 acres of land comprised of two parcels that border the northern end of the existing Lamb Canyon Landfill to capture and manage drainage flows that impact landfill activities through surface drainage improvements; improve on-site access, site security, facility maintenance, environmental management, and dirt management; and facilitate the development of ancillary landfill activities (Proposed Project).

SCAQMD Staff's Summary of Air Quality Analysis

SCAQMD staff reviewed the air quality analysis in the MND and found that the Lead Agency quantified the Proposed Project's construction air quality impacts and compared those impacts to SCAQMD's regional air quality CEQA significance thresholds for construction. Based on the analysis, the Lead Agency found that the Proposed Project would result in less than significant air quality impacts during construction, and that no mitigation measures are required.¹

SCAQMD Staff Comments

SCAQMD staff is concerned that the Proposed Project's operational air quality impacts were not analyzed in the MND. One of the basic purposes of CEQA is to inform government decision makers and the public about the potential significant environmental effects of proposed activities (CEQA Guidelines Section 15002(a)(1)). A mitigated negative declaration is appropriate when the Lead Agency finds that a project will not have a significant effect on the environment after incorporating mitigation measures (CEQA Guidelines Sections 15070 to 15075). Reasons to support this finding shall be documented in the initial study. While the Lead Agency has disclosed that portions of the existing landfill fleet are anticipated to be redirected as part of the normal, day-to-day, and on-going landfill maintenance and site improvement activities for the Proposed Project, the Lead Agency has not quantified the Proposed Project's operational emissions which serves as substantial evidence to support a fair argument that the Proposed Project would not have any adverse effects on air quality during operation². Therefore, SCAQMD staff recommends that the Lead Agency disclose the Proposed Project's operational impacts by calculating the Proposed Project's operational emissions and comparing those emissions to SCAQMD's air quality CEQA operational significance thresholds³ in the Final MND.

¹ MND. *Section 3 Air Quality*. Page 23.

² *Ibid*. *Section 3 Air Quality*. Page 22.

³ South Coast Air Quality Management District. *SCAQMD Air Quality Significance Thresholds*. Available at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>.

Permits

Since the Proposed Project requires permits from SCAQMD⁴, SCAQMD should be identified as a Responsible Agency for the Proposed Project in the Final MND. For more information on permits, please visit the SCAQMD webpage at: <http://www.aqmd.gov/home/permits>. Questions on permits can be directed to the SCAQMD's Engineering and Permitting staff at (909) 396-3385.

Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process. SCAQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Ryan Bañuelos, Air Quality Specialist, CEQA Section, at (909) 396-3479, if you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS:RB

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Control Number

⁴ *Ibid.* Section 3 Air Quality. Page 14.