



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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Mitigated Negative Declaration (MND) for the Proposed Riverview Development Project (Proposed Project) (SCH No.: 2024061060)

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to review the above-mentioned document. The City of Santa Clarita is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff has provided a brief summary of the project information and prepared the following comments, which are organized by topic of concern.

South Coast AQMD Staff's Summary of Project Information in the MND

Based on the information provided in the MND, the Proposed Project includes constructing 318 single-family units and a 126,790-square-foot light industrial building on a 35.2-acre property.¹ The Proposed Project is located at 22500 Soledad Canyon Way in Santa Clarita.² The proposed project site would be split into five planning areas (PAs), where PAs 1, 2, 3, and 4 are dedicated to residential development, while PA 5 is for a light manufacturing building.³ The light industrial building would provide 18 dock doors and generate approximately 609 average daily truck trips.⁴ According to aerial photographs, South Coast AQMD staff found that the nearest sensitive receptor is within 100 feet northwest of the Proposed Project site. The site preparation and grading are expected to begin in late 2024 and conclude by December 2025, with building construction commencing in 2026 and lasting for over four to five years.⁵

South Coast AQMD Staff's Comments on the MND

Recommendation on Siting New Sensitive Land Uses (Residential Areas)

The Proposed Project is located within the land use and zoning designation of Mixed-Use Corridor (MXC),⁶ which allows the use of the proposed property.⁷ However, South Coast AQMD is concerned about the potential health impacts of siting the manufacturing building that generates

¹ MND. Page 1.

² *Ibid.*

³ *Ibid.* Pages 5 and 7.

⁴ Appendix A - Health Risk Assessment. Page 12.

⁵ *Ibid.* Page 10.

⁶ *Ibid.* Page 4.

⁷ *Ibid.* Page 20.

609 daily truck trips⁸ that are in close proximity to existing and new sensitive land uses since the operation generates and attracts heavy-duty diesel-fueled trucks that emit Diesel Particulate Matter (DPM). Based on the aerial photographs, South Coast AQMD staff found that the nearest existing sensitive receptor is within 100 feet northwest of the Proposed Project site at 22722 Soledad Canyon Road. Also, according to the IS-MND, Figure 3. Site Plan, it is estimated that the loading docks/truck idling would be less than 500 feet from existing and proposed residential areas.

When the health impacts from the Proposed Project are added to the existing background, both existing and new residents living in the surrounding communities will likely face even greater exposure to air pollution and bear a disproportionate burden of increasing health risks. Moreover, the proposed high-density residential area will be north of the Southern Pacific Railroad line. Consequently, the lead agency is recommended to follow CARB and South Coast AQMD land-use guidance to ensure that sensitive receptors are not heavily affected by the warehouse truck activities and other sources of emissions. This guidance includes:

- 1) The CARB's *Air Quality and Land Use Handbook: A Community Health Perspective*⁹ is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process with additional guidance on strategies to reduce air pollution exposure near high-volume roadways available in CARB's technical advisory.¹⁰
- 2) The South Coast AQMD's *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*¹¹ includes suggested policies that local governments can use in their General Plans or through local planning to prevent or reduce potential air pollution impacts and protect public health. It is recommended that the Lead Agency review this Guidance Document as a tool when making local planning and land use decisions.

By adhering to these essential guidance documents and implementing proactive Mitigation Measures (MMs), the Lead Agency can avoid, eliminate, or reduce the adverse impacts of warehouse and truck activities on public health, ensuring that vulnerable communities are adequately protected from disproportionate exposure to air pollution.

Recommend Revision to Air Quality Mitigation Measure

In the air quality section of the MND, the Proposed Project's regional and localized construction and operational emissions have been quantified and compared to South Coast AQMD Air Quality Significance Thresholds,¹² and the results are presented in Table 7.¹³ However, the localized

⁸ Appendix A - Health Risk Assessment. Page 12.

⁹ CARB's *Air Quality and Land Use Handbook: A Community Health Perspective* can be found at: <http://www.arb.ca.gov/ch/handbook.pdf>.

¹⁰ CARB's technical advisory can be found at: <https://www.arb.ca.gov/ch/landuse.htm>.

¹¹ South Coast AQMD. 2005. *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*. Available at: <http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf>.

¹² South Coast AQMD Air Quality Significance Thresholds. Available at: <https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf>.

¹³ *Ibid.* Page 24.

construction emissions show an exceedance for PM₁₀. The mitigation measure MM AIR-1¹⁴ is proposed with “*all off-road diesel-powered construction equipment of 50 hp or more used for the project construction at a minimum meets the California Air Resources Board Tier 2 emissions standards equipped with level 3 diesel particulate filters.*” The MND concludes that with the implementation of MM AIR-1, the Proposed Project-related emissions would be less than significant.¹⁵ Even though the implementation of MM AIR-1 could reduce the impacts, South Coast AQMD staff recommends that the Lead Agency revise the MM AIR-1 to ensure the use of the cleanest technology, which currently is Tier 4 equipment, as it is available and feasible to reduce the impacts from the construction activities further.

Health Risk Reduction Strategies

Many strategies are available to reduce exposures, including, but not limited to, building filtration systems with MERV 13 or better, or in some cases, MERV 15 or better is recommended, building design, orientation, location, vegetation barriers, landscaping screening, etc. Enhanced filtration units are capable of reducing exposures. However, enhanced filtration systems have limitations. For example, in a study that South Coast AQMD conducted to investigate filters,¹⁶ a cost burden is expected to be within the range of \$120 to \$240 per year to replace each filter panel. The initial start-up cost could substantially increase if an HVAC system needs to be installed and if standalone filter units are required. Installation costs may vary and include costs for conducting site assessments and obtaining permits and approvals before filters can be installed. Other costs may include filter life monitoring, annual maintenance, and training for conducting maintenance and reporting. In addition, because the filters would not have any effectiveness unless the HVAC system is running, there may be increased energy consumption that the Lead Agency should evaluate in the Final MND. It is typically assumed that the filters operate 100 percent of the time while residents are indoors, and the environmental analysis does not generally account for the times when the residents have their windows or doors open or are in common space areas of the project. These filters have no ability to filter out any toxic gases. Furthermore, when used filters are replaced, replacement has the potential to result in emissions from the transportation of used filters at disposal sites and generate solid waste that the Lead Agency should evaluate in the Final MND. Therefore, the presumed effectiveness and feasibility of any filtration units should be carefully evaluated in more detail prior to assuming that they will sufficiently alleviate exposures to diesel particulate matter emissions.

South Coast AQMD Rules, Permits, and Responsible Agency

Based on the information in Appendix A – Air Quality and Greenhouse Gas Analysis, the Proposed Project would require the use of a new 500-horsepower diesel backup generator.¹⁷ Hence, air permits from South Coast AQMD will be required, and the role of South Coast AQMD would change from a Commenting Agency to a Responsible Agency under CEQA. In addition, if South Coast AQMD is identified as a Responsible Agency, per CEQA Guidelines Sections 15086, the

¹⁴ *Ibid.* Page 26.

¹⁵ *Ibid.* Page 25.

¹⁶ This study evaluated filters rated MERV 13 or better. Available at: <http://www.aqmd.gov/docs/defaultsource/ceqa/handbook/aqmdpilotstudyfinalreport.pdf>. Also, see South Coast AQMD's 2012 Peer Review Journal article at <https://onlinelibrary.wiley.com/doi/10.1111/ina.12013>.

¹⁷ Appendix A. Air Quality and Greenhouse Gas Analysis. Page 2.

Lead Agency is required to consult with South Coast AQMD. In addition, CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of evaluating the applications for air permits. For these reasons, the Final MND should include a discussion about any new stationary and portable equipment requiring South Coast AQMD air permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project.

The Final MND should also include calculations and analyses for construction and operation emissions for the new stationary and portable sources, as this information will also be relied upon as the basis for the permit conditions and emission limits for the air permit(s). Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions regarding what types of equipment would require air permits. For more general information on permits, please visit South Coast AQMD's webpage at <http://www.aqmd.gov/home/permits>.

Conclusion

The Lead Agency is recommended to revise the CEQA analysis to address the aforementioned comments and provide the necessary evidence to sufficiently support the conclusions reached. If the requested information and analysis are not included in the final CEQA document, either the Final MND or other type of CEQA document, the Lead Agency should provide reasons for not doing so. Pursuant to California Public Resources Code Section 21092.5(b) and 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 and notify each public agency when any public hearings are scheduled. Please provide South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided. In addition, if the Lead Agency decides to adopt the Final MND, please provide South Coast AQMD with notice of any scheduled public hearing(s).

Thank you for the opportunity to provide comments. South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Danica Nguyen, Air Quality Specialist, at dnguyen1@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

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Planning, Rule Development & Implementation

SW:DN

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