



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT BY E-MAIL & USPS:
Jeff.Anderson@westcovina.org

October 16, 2014

Mr. Jeff Anderson, Director
Planning Department
City of West Covina
1444 W. Garvey Avenue
West Covina, CA 91790

**Draft Mitigated Negative Declaration (Draft MND) for the Proposed Bella Vista
Specific Plan (Tentative Tract Map. No. 72152)
Located at 1611, 1623, & 1733 San Bernardino Road**

The South Coast Air Quality Management District (SCAQMD) 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 Mitigated Negative Declaration.

In the project description, the Lead Agency proposes to demolish the existing buildings located on the 6.49-acre site in an area zoned for Manufacturing (M-1). In addition, a general plan amendment is proposed changing the site area zoning from industrial to residential. The proposed project would then build 135 town-home units with 67 guest parking spaces, with both the townhome units and garages built at grade. Construction is expected to begin in early 2015 and be completed in approximately 36-months, around January 2018. The Lead Agency agency estimated regional and localized air quality impacts and compared those estimates with recognized significance thresholds. For the analysis of health risk impacts from facilities located near the proposed residential site, the screening level version of the Industrial Source Complex Model (SCREEN3) was used.

The SCAQMD staff reiterates its concerns made in its previous comment letter dated June 21, 2013 that the proposed residences would be located within one quarter mile of at least four SCAQMD permitted facilities.¹ In addition, the proposed project site is just south, across railroad tracks, of a produce warehouse and distribution business with loading docks for trucks operating at the facility facing the proposed residences. Finally, the proposed site is located just south of railroad tracks operated by the Southern California Regional Rail Authority (Metro Link) that are also used by trains operated by the Southern Pacific Railroad. These railroad tracks show daily train activity of approximately 42 trains that have an average of 2-3 diesel-fueled locomotive engines per train operating on those tracks. The SCAQMD staff has concerns about the model

¹ See SCAQMD Facilities List After Comment No. 2

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chosen to estimate health risk effects and the assumptions used in the modeling. Details are included in the attachment.

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final MND. The SCAQMD staff is available to work with the Lead Agency to address these issues and any other air quality questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

Jillian Baker

Jillian Baker, Ph.D.
Program Supervisor
Planning, Rule Development & Area Sources

Attachment

JB:GM

LAC141007-06
Control Number

Health Risk Assessment (HRA) Modeling

1. SCREEN3 is a screening level dispersion model capable of estimating the impacts from one source at a time but not multiple sources. Therefore, SCREEN3 is not appropriate to use to estimate cancer risks at this project since the area surrounding the project site is comprised of many different sources of diesel particulate matter (DPM) including warehouses, rail lines, etc.. Since December 9, 2006, the Atmospheric Dispersion Modeling System (AERMOD) was fully promulgated as a replacement to the Industrial Source Complex Model, in accordance with guidance from the Environmental Protection Agency.² Therefore, the SCAQMD staff recommends that the Lead Agency revise the HRA using the most recent version of AERMOD to estimate health risks from multiple sources and also use the most recent version of meteorological data available³ for the dispersion modeling analysis.
2. In addition, the revised HRA should consider the following comments concerning the modeling assumptions made in the Draft MND, as applicable.
 - a) The HRA used the trip generation rates from the 8th edition of the Institute of Transportation Engineers (ITE) Trip Generation Manual. The 9th edition is the current edition and should be used to revise the HRA. In the 9th edition, the ITE made revisions to the High Cube Warehouse/Distribution Center land use, which would affect the HRA.
 - b) In Table 1 of the HRA, please include the number of trips estimated for the San Gabriel Valley Tribune project, which were used in the HRA.
 - c) In the HRA, the analysis only included five minutes of idling. Although state regulations only allow five minutes of idling at any one time, trucks may idle for five minute periods several times on-site, e.g., five minutes entering, five minutes on-site and five minutes exiting, etc., SCAQMD staff therefore recommends that 15 minutes of idling be used in the HRA analysis.
 - d) Since a rail line is adjacent to the project's northern boundary, SCAQMD staff recommends using a minimum 1,000-foot radius around the project site to estimate the health impacts from locomotive engine activity.
 - e) When modeling the roadways, rail lines, and truck movement including idling at various locations, if volume sources are chosen, the Lead Agency must ensure that no receptors are placed within the volume source exclusion zone. This can be done by using smaller, adjacent volume sources or by using an area source instead.

² EPA Website: [Appendix W](#).

³ SCAQMD Website: <http://www.aqmd.gov/home/library/air-quality-data-studies/meteorological-data/data-for-aermod>.

- f) The HRA used receptors placed at distances between 100 meters to 1,000 meters. However, based on a review of the aerial maps, the industrial uses would be closer than 100-meters. Therefore, SCAQMD staff recommends that the receptors be placed appropriately so that health risks are not underestimated.

SCAQMD Permitted Facilities Within One-Quarter Mile of the Project Site

Facility Identification Number	Name	Address
7175	L.A. County Sanitation District, San Gabriel Valley	1927 W. San Bernardino Road
7238	Interspace Battery Corp.	2009 W. San Bernardino Road
40081	West Covina Auto Body	1921 W. San Bernardino Road
59007	Bob Lowry & Son Auto Body	1907 W. San Bernardino Road
69973	Decore-Ative Specialties, Inc.	4414 N. Azusa Canyon Road
102153	Ready Pac Produce, Inc.	4401 Foxdale
159301	Gama Contracting Services, Inc.	15825 E. Edna Place
171713	Tesoro Station (USA) 63294	1733 W. San Bernardino Road