



**South Coast
Air Quality Management District**
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**Draft Initial Environmental Impact Report (DEIR) for the Proposed French Valley
Airport Center**

The South Coast Air Quality Management District (SCAQMD) staff 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 EIR.

In the Notice of Completion and Chapter 3 – Project Description of the DEIR, the Lead Agency proposes to construct a business park/industrial park development (754,411 square feet) on approximately 82.07 acres in two phases. According to Section 4.2 – Air Quality and Appendix 1a – Air Quality Impact Analysis, Phase 1 and Phase 2 would consist of 331,003 square feet and 363,626 square feet of business park use respectively. In total, both Phases would result in 694,629 square feet of business park space. The total square footage used throughout the DEIR is inconsistent and should be rectified in the Final EIR.

Additionally, the Lead Agency should clarify the proposed land use. Chapter 3 – Project Description states that the proposed project will be used for business park/industrial park development; whereas, Appendix 1a – CalEEMod calculations lists the land usage as “Office Park.” Furthermore, according to the County of Riverside Planning Department General Plan¹, the proposed project is located in a “light industrial” zone. SCAQMD staff recommends maintaining consistent land use throughout the Final EIR as well as utilizing the most conservative land use to ensure the Project’s impacts are conservatively estimated.

According to the Localized Significance Threshold (LST) analysis, during construction, no more than 3.5 acres would be disturbed per day. It is unclear how the Lead Agency determined the LST. Localized Significance Threshold values are not to be interpolated from the Mass Rate LST Look-Up Table². The Lead Agency should use the mass look up table for a 2-acre site or perform dispersion modeling using AERMOD to analyze the projects localized impacts from construction. SCAQMD staff recommends the Lead Agency revise the LST analysis in the Final EIR.

¹ Riverside County Planning Department General Plan

<http://planning.rctlma.org/ZoningInformation/GeneralPlan/AreaPlanMaps.aspx>

² The Localized Significance Threshold (LST) methodology and Mass Rate LST Look Up Table is available at:

<http://www.aqmd.gov/ceqa/handbook/LST/LST.html>

Furthermore, in the Localized Significance Threshold (LST) analysis the nearest sensitive receptor is stated to be 119.75 meters away. However, a review of aerial maps³ shows the nearest sensitive receptor is located less than 25-meters east of the project site, across from Leon Road. Therefore, SCAQMD staff recommends the Lead Agency revise the LST analysis in the Final EIR using the 25-meter distance in the appropriate mass look-up table or use AERMOD with the actual receptor placement to determine the localized impacts.

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 Baker

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³ <https://maps.google.com>