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San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

Fax Transmittal

1990 E. Gettysburg Avenue
Fresno, California 93726-0244
Permit Services Phone (559) 230-6000

Date : May 27, 2010

To : David Bryant

Fax Number : (559) 730-2653

From : Jessica Willis

Number of pages (includes cover sheet): 4

Description : Comments regarding the 2030 General Plan Update and Recirculated Draft EIR

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| <input type="checkbox"/> Per Your Request | <input checked="" type="checkbox"/> For Your Information |
| <input type="checkbox"/> Per Our Conversation | <input type="checkbox"/> For Your Approval |
| <input type="checkbox"/> Take Appropriate Action | <input type="checkbox"/> Review & Comment |
| <input type="checkbox"/> Please Answer | <input type="checkbox"/> Review & Return |

Original transmittal will follow via mail

Remarks / Response : The signed original will be mailed for your records.



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT



HEALTHY AIR LIVING™

May 26, 2010

David Bryant
Tulare County RMA
Planning Department
Government Plaza
5961 S. Mooney Blvd.
Visalia, CA 93277

Project: Tulare County General Plan 2030 Update

District CEQA Reference No: 20100221

Dear Mr. Bryant:

The San Joaquin Valley Unified Air Pollution Control District (District) has reviewed the Tulare County General Plan 2030 Update and Recirculated Draft Environmental Impact Report (RDEIR). The District offers the following comments:

1. AB 170 (Reyes) requires general plans to be amended to include a comprehensive discussion on air quality and strategies to reduce the impact that growth and development will have on air quality. The Air Quality Element (Chapter 9) of the General Plan identifies the County's goals, policies, and objectives to improve air quality; and feasible implementation measures designed to achieve these goals. Section 3.3 of the RDEIR includes the discussions on local air quality conditions, attainment status, and state and federal air quality plans, and a summary of local, district, state, and federal policies, programs, and regulations to improve air quality. As the General Plan and RDEIR have been combined to minimize redundancy, the documents appear to fulfill the requirements set forth in AB 170 (Reyes).
2. Many of the elements within the General Plan contain goals and policies which require the County to coordinate with other agencies in the planning process for new development. These policies are designed to enhance the quality of life of the County's residents through ensuring development consistent with the General Plan, ensuring public involvement, and reducing impacts on air quality resulting from growth and development. The District appreciates the County's ongoing

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Executive Director/Air Pollution Control Officer

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commitment to public and interagency cooperation and appreciates the opportunity to aid the County in its planning process and CEQA review.

- A) To aid the County in determining a project's potential impacts on air quality, the District recommends that CEQA referral documents submitted to the District include a project summary detailing, at a minimum, the land use designation, project size, and proximity to sensitive receptors and existing emission sources.
 - B) CEQA referral documents should be submitted to the District's CEQA Division located at the District's Central Office at 1990 E. Gettysburg Avenue, Fresno CA 93726-0244. To minimize paper consumption and help expedite project review, the District recommends that CEQA referrals be submitted via e-mail at CEQA@valleyair.org.
3. The General Plan includes many policies addressing potential issues from inappropriate siting of incompatible land uses (AQ-1.4; AQ-3.1-3.6; LU-1.1-1.4; LU-1.8). Policy AQ-1.4 specifically addresses potential health impacts on sensitive receptors by requiring the County to evaluate the compatibility of industrial or other developments which may have impacts on nearby sensitive receptors. The discussion on health impacts in the RDEIR (Impact 3.3-4) concludes that, although the County will implement the policies identified above and will require CEQA analysis for future projects, due to the uncertainty of future projects and adequacy of mitigation measures, the buildout of the General Plan would have significant and unavoidable impacts affecting public health.
- A) The District commends the County for its commitment to protecting the health of its citizens. The District understands that the level of detail required to accurately quantify health risks is typically not available until project specific approvals are being granted. Therefore, the District recommends that when reviewing projects, including those that would otherwise appear to be exempt from CEQA requirements (such as uses allowed by right), the County evaluate the potential health risks prior to project approval.
 - B) If preliminary health risk analysis indicates that toxic air contaminants (TACs) are a concern, the District recommends that a Health Risk Assessment (HRA) be performed. The District maintains a staff of professional air quality specialists who are available to provide technical assistance. For more information on preliminary analyses and HRAs, please contact Mr. Leland Villalvazo, Supervising Air Quality Specialist, by e-mail at hramodeler@valleyair.org or by phone at (559) 230-6000.
4. Policy AQ-2.2 requires the County to notify developers of the District's Indirect Source Review (ISR) Rule 9510. Rule 9510 was designed to mitigate project impacts on air quality and plays an important role in the District's strategies to achieve attainment for ozone and PM2.5. The District commends the County in its

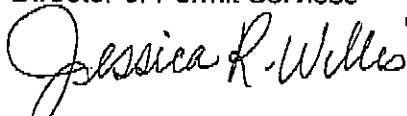
recognition of the importance of the ISR program and appreciates the opportunity to work closely with the County in its implementation.

- A) To reduce County staff time in responding to project proponent questions about the ISR programs, the District recommends that CEQA referrals include project proponent contact information. District receipt of the requested information will allow District staff to contact developers and assist them in understanding how to reduce project related impacts on air quality and how to complete the ISR application process.
 - B) To reduce County staff time in responding to inquiries regarding the District's permitting process and aid project proponents in complying with District requirements the District recommends that the County provide a copy of District comments to the applicant.
5. Air Quality Implementation Measure #9 requires the County to implement an outreach program to notify employers with 100 or more employees of the District's Employer Based Trip Reduction (eTRIP) Rule 9410. The reduction in vehicle miles traveled (VMT) and employee vehicle trips emissions resulting from implementation of Rule 9410 plays an important role in the District's strategies to achieve attainment for ozone. The District commends the County in its recognition of the importance of the eTRIP program and appreciates the opportunity to work closely with the County in its implementation. The District maintains a staff of professional air quality specialists who are available to provide technical assistance. More information on the District's eTRIP program can be found on the District's website at http://www.valleyair.org/Programs/Rule9410TripReduction/eTRIP_main.htm or by contacting eTRIP staff at (559) 230-6000.

District staff is available to meet with you to further discuss the regulatory requirements that are associated with this project. If you have any questions or require further information, please call Jessica Willis at (559) 230-5818 and provide the reference number at the top of this letter.

Sincerely,

David Warner
Director of Permit Services



Arnaud Marjollet
Permit Services Manager



DW:jw

Cc: File