

SENT VIA USPS AND E-MAIL:

July 28, 2017

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**Mitigated Negative Declaration (MND) for the Proposed
Hillwood Gateway Building 5 Industrial Warehouse Project**

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 MND.

Project Description

The Lead Agency proposes to construct and operate a 170,260-square-foot, high-cube warehouse with unknown occupants on an approximately 8.76-acre site (“Proposed Project”). The Proposed Project is bounded by commercial uses to the north, east, south, and west.

Air Quality Modeling Files

On July 26, 2017 at 10:56 a.m., SCAQMD staff requested that all air quality modeling, health risk assessment files, and original emission calculation spreadsheets be provided in electronic format¹. On July 27, 2017 at 3:08 p.m., SCAQMD staff made a second request to the Lead Agency for the air quality modeling files². As of July 28, 2017 9:00 a.m., air dispersion models have not been provided to SCAQMD for review³. Without all electronic files and supporting documentation, SCAQMD staff was unable to complete a thorough review of the air quality analyses. The following comments were based on SCAQMD staff’s review of the air quality modeling files in PDF.

Air Quality and Health Risk Assessment (HRA) Analyses

In the Air Quality Section, the Lead Agency quantified the Proposed Project’s construction and operational emissions and compared them to SCAQMD’s regional and localized air quality CEQA significance thresholds. The air quality analysis was based on approximately 286 total vehicle trips, including 109 daily heavy-duty truck trips⁴. The Lead Agency found that regional and localized construction and operational emissions would be less than significant after incorporating Mitigation Measures (MM) AQ-1 through MM AQ-13. Additionally, the Lead Agency performed a HRA and found that the Maximum Exposed Individual Resident cancer risk would be 2.15 in one million, which is below SCAQMD’s CEQA significance threshold of 10 in one million for cancer risk⁵.

SCAQMD staff has concerns about the HRA analysis in the MND. The analysis utilized assumptions which have likely led to an under-estimation of the Proposed Project’s health risk impacts. Details are included in the attachment. After revising the HRA analysis, should the Lead Agency find that the Proposed Project’s health impacts would exceed SCAQMD’s CEQA significance thresholds, mitigation

¹ E-mail correspondence from SCAQMD staff (Mr. Jack Cheng) to the Lead Agency (Ms. Oliver Mujica) on July 26, 2017.

² E-mail correspondence from SCAQMD staff (Mr. Jack Cheng) to LSA Associates (Mr. Kent Norton) on July 27, 2017.

³ *Ibid.* July 27, 2017. SCAQMD staff (Mr. Jack Cheng) made a second request to LSA Associates (Mr. Kent Norton).

⁴ Hillwood Gateway Building 5 Industrial Warehouse. Initial Study and Mitigated Negative Declaration. Section XV: *Transportation/Circulation*.

⁵ *Ibid.* Appendix A-1: *AQ GHG HRA Report*. Page 30.

measures are required pursuant to the CEQA Guideline Section 15074(b). SCAQMD staff has included an additional mitigation measure in the attachment to further reduce operational impacts from heavy trucks.

Pursuant to the 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. Please provide SCAQMD staff with written responses to all comments contained herein prior to the adoption of the Final MND.

SCAQMD staff is available to work with the Lead Agency to address the issues raised in the letter and any other air quality and HRA questions that may arise. Please contact Jack Cheng, Air Quality Specialist – CEQA IGR Section, at (909) 396-2448, if you have any questions regarding these comments.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment

LS:JC

SBC170712-02

Control Number

ATTACHMENT**Health Risk Assessment (HRA) Analysis**

1. Based on a review of the HRA analysis, SCAQMD staff found that the HRA analysis utilized the 2015 revised OEHHA guidelines to estimate the health risks to sensitive receptors in the Proposed Project's vicinity and that the AERMOD dispersion model was used to estimate diesel particulate matter (DPM) concentrations. SCAQMD staff recommends that the Lead Agency revise the HRA analysis based on the following comments.
 - a. The 2015 revised OEHHA guidelines acknowledge that children are more susceptible to the exposure to air toxics and have revised the way cancer risks are estimated to take this into account. Since the emissions from the project-generated trucks get cleaner with time due to existing regulations, it would not be appropriate to average out the emissions over the 70-year exposure duration since this would underestimate the health risks to children who would be exposed to higher DPM concentrations during the early years of project operation. Therefore, SCAQMD staff recommends that the DPM emissions for each year of operation be applied to each of the corresponding age bins (i.e. emissions from Year 1 of project operation should be used to estimate cancer risks to the third trimester to 0 year age bin; Year 1 and 2 of project operation should be used to estimate the cancer risks to the 0 to 2 years age bins; and so on).
 - b. The HRA analysis compared the Maximum Incremental Cancer Risk (MICR) from the Residential Sensitive Receptor 16 < 70 year Age Group to SCAQMD's CEQA significance threshold of 10 in one million for cancer risk. The 16 < 70 year Age Group MICR (2.15 in one million) did not account for the cancer risks to children. As described in Comment 1 (a) above, children are more susceptible to the exposure to air toxics. By excluding the 0 < 16 year Age Group, the HRA has likely underestimated the MICR. The MICR should be the total cancer risks for all age groups starting from the 3rd trimester to 30 years. Therefore, SCAQMD staff recommends that the Lead Agency revise the MICR and compare it to SCAQMD's CEQA significance threshold of 10 in one million in the Final MND.
 - c. The HRA analysis involved the use of separate discrete receptors placed randomly. SCAQMD staff recommends that the Lead Agency revise the HRA and use a receptor grid of no more than 100-meter spacing over the existing residences and areas zoned or planned for residential development, in order to ensure that the maximum impacts to a residential receptor are properly analyzed. Receptor locations should be placed at the boundaries of the residential property and not the residential structure since residents have the potential to spend time outdoors (recreation, dining, etc.). Placing receptors on the residential structure underestimates cancer risks to the residents. SCAQMD staff recommends that the Lead Agency revise the model and start the grid at the property boundaries to ensure potential maximum concentrations are identified.
 - d. All truck routes terminate in the residential neighborhood. Truck routes should be modeled from the Proposed Project site to where the trucks enter the freeway. For example, truck routes should extend south along Tippacanoe Avenue to where the trucks enter Interstate 10, or other approved truck routes. SCAQMD staff recommends that the Lead Agency revise the model using appropriate source placement as well as additional receptor grids extending to the freeway.

Additional Mitigation Measure for Operational Air Quality Impacts (Mobile Sources)

2. CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant impacts. In the event that the Lead Agency, after revising the HRA analysis based on the comments provided above, finds that the Proposed Project would result in significant health risk impacts, SCAQMD staff recommends incorporating the following on-road mobile-source truck related mitigation measure in the Final MND. For more information on potential mitigation measures as guidance to the Lead Agency, please visit SCAQMD's CEQA Air Quality Handbook website⁶.

AQ-14: Require the use of 2010 and newer haul trucks (e.g., material delivery trucks and soil import/export). In the event that that 2010 model year or newer diesel haul trucks cannot be obtained, provide documentation as information becomes available and use trucks that meet EPA 2007 model year NOx emissions requirements⁷, at a minimum. Additionally, consider other measures such as incentives, phase-in schedules for clean trucks, etc.

⁶ South Coast Air Quality Management District. <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.

⁷ Based on a review of the California Air Resources Board's diesel truck regulations, 2010 model year diesel haul trucks should have already been available and can be obtained in a successful manner for the project construction California Air Resources Board. March 2016. Available at: <http://www.truckload.org/tca/files/ccLibraryFiles/Filename/000000003422/California-Clean-Truck-and-Trailer-Update.pdf> (See slide #23).