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SENT VIA E-MAIL: July 29, 2022

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Mitigated Negative Declaration (MND) for the Proposed NWC of 3rd Street and Central Avenue Warehouse Project (Proposed Project) (SCH No.: 2022070212)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The City of Highland is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. The following comment includes a recommended revision to the sensitive receptor location as it pertains to the Health Risk Assessment (HRA).

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

Based on the MND, the Lead Agency proposes demolition of an existing structure and the construction of a 54,330 square-foot one-story warehouse building on a 3.01-acre site.[1] The Proposed Project is located at the northwest corner of 3rd Street and Central Avenue in the City of Highland, California 92346. The 48,330 square-foot warehouse portion will include 9 loading docks and involve 26 truck trips per day.[2,3] Based on a review of aerial photographs, South Coast AQMD staff found that the nearest sensitive receptor (e.g., residence) is within 50 feet of the Proposed Project. Construction of the Proposed Project is anticipated to begin in the second quarter of 2022.[4] Construction emissions include demolition and hauling of 2,357 tons of debris.[5] Operation is expected to begin in 2023.[6]

South Coast AQMD Staff's Summary of Air Quality Analysis and Health Risk Assessment in the Draft EIR

Construction (localized and regional emissions)

In the MND, the Lead Agency quantified the Proposed Project's construction emissions and compared those emissions to South Coast AQMD's recommended localized and regional air quality CEQA significance thresholds for construction. The Lead Agency found that the Proposed Project's unmitigated localized air quality emissions for construction would be significant for

[1] MND. 2.3 Project Characteristics. Page 16.
[2] *Ibid.* Page 16 & 17.
[3] *Ibid.* 3.17 Transportation. Page 112.
[4] *Ibid.* 2.4 Project Construction and Phasing. Page19.
[5] *Ibid.* Page 34.
[6] *Ibid.* Page 36.

PM_{10} (particulate matter with an aerodynamic diameter of 10 microns or less) and $PM_{2.5}$ (particulate matter with an aerodynamic diameter of 2.5 microns or less) at 10.46 pounds per day (lbs/day) and 6.03 lbs/day,[7] respectively, which is above South Coast AQMD's CEQA LST for construction PM_{10} and $PM_{2.5}$ emissions at 9.33 lbs/day and 5.33 lbs/day, respectively. The Lead Agency is committed to Mitigation Measure (MM) MM-AQ-1, which would require that for off-road construction equipment greater than 50 brake horsepower, no construction equipment shall be used that is less than Tier 4 Interim.[8] With implementation of MM-AQ-1, the Proposed Project's localized construction air quality impacts from PM_{10} and $PM_{2.5}$ emissions would be reduced to less than significant at 8.91 lbs/day and 4.61 lbs/day, respectively.[9] Additionally, the Lead Agency found that the Proposed Project's unmitigated regional construction air quality emissions were less than significant.[10]

Operation (localized and regional emissions)

The Lead Agency quantified the Proposed Project's operational emissions and compared those emissions to South Coast AQMD's recommended localized and regional air quality CEQA significance thresholds for operation. Based on this analysis, the Lead Agency found that the Proposed Project's unmitigated localized and regional operational air quality impacts would be less than significant.[11]

HRA

Additionally, the Lead Agency conducted a HRA for the Proposed Project's construction and operational activities. Construction and operational activities were found to result in a maximum cancer inhalation risk of 81.0 in one million and 33.6 in one million,[12] respectively, which would exceed South Coast AQMD's CEQA significance threshold of 10 in one million for cancer risk. With Implementation of MM-AQ-1, the maximum cancer risk during construction would be reduced to 9.88 in one million, which would be below the significance threshold.[13] For operations, the Lead Agency is committed to MM-AQ-2, which requires the use of natural gas powered forklifts during operation of the Proposed Project to load and unload trucks within the truck loading area.[14] With implementation of MM-AQ-2, the maximum cancer risk during operations would be reduced to 1.0 in one million, which would be below the significance threshold.[15] Finally, the Lead Agency discussed South Coast AQMD Rules 403, 1113, 1403, and 2305 in the MND. [16,17]

<u>South Coast AQMD Staff's Comment</u>

[7] *Ibid.* Page 40.
[8] *Ibid*. Page 40.
[9] *Ibid*. Page 41.
[10] *Ibid*. Page 36.
[11] *Ibid*. Page 38 & 40.
[12] *Ibid.* Page 46 & 49.
[13] *Ibid*. Page 46.
[14] *Ibid*. Page 49.
[15] *Ibid.* Page 49.
[16] *Ibid*. Page 35 and 37 through 38.
[17] *Ibid*. 3.9 Hazards and Hazardous Materials. Page. 83.

Location of Maximally Exposed Individual Resident (MEIR) receptor used for HRA

The unmitigated construction HRA for the Proposed Project states that the estimated incremental cancer risk for the MEIR is 81.8 in one million. With MM-AQ-1, the cancer risk during construction would be reduced to 9.88 in one million, and thus be made less than significant.[18] How far the MEIR is in relation to the Proposed Project, however, is unclear in the MND and the associated Appendix-1 and Appendix-2. Based on a review of aerial photographs, South Coast AQMD staff found that the nearest sensitive receptor (e.g., residence) is less than 50 feet away from the Proposed Project. How far the MEIR is from the Proposed Project should be made clear in the MND as this is crucial in reviewing the accuracy of the air quality analysis and in determining the estimated incremental cancer risk. Staff recommends that the location of the MEIR be identified and its distance to the Proposed Project be made clear in the MND and to include the adjacent resident as the closest receptor in the HRA.

Likewise, the location of the MEIR used for the operational HRA analysis is also unclear. Staff recommends that the location of this MEIR, and its distance to the Proposed Project, be made clear as well and to include the adjacent resident as the closest receptor.

Conclusion

According to 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 South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When the Lead Agency's position is at variance with recommendations raised in the comments, the issues raised in the comments should be addressed in detail, giving reasons why specific comments and suggestions are not accepted. There should be good faith and reasoned analysis in response. Conclusory statements unsupported by factual information do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision-makers and the public who are interested in the Proposed Project.

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 Evelyn Aguilar, Air Quality Specialist, at eaguilar@aqmd.gov should you have any questions.

Sincerely,

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MM:SW/EA
SBC220715-05
Control Number

[18] *Ibid*. 3.3 Air Quality. Page 46.