South Coast
Air Quality Management District
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FAXED: OCTOBER 26, 2007

October 26, 2007

Mr. Jaime Murillo
City of Newport Beach
Planning Department
3300 Newport Boulevard
Newport Beach, CA 92658-8915

Dear Mr. Murillo:

Draft Environmental Impact Report (DEIR) for the Hoag Health Center Use Permit Amendment (September 2007)

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document, and thanks the lead agency for allowing additional time for submitting comments. The following comments are meant as guidance for the lead agency and should be incorporated in the Final Environmental Impact Report.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Environmental Impact Report. The SCAQMD would be available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Charles Blankson, Ph.D., Air Quality Specialist – CEQA Section, at (909) 396-3304 if you have any questions regarding these comments.

Sincerely

Steve Smith, Ph.D.
Program Supervisor, CEQA Section
Planning, Rule Development & Area Sources

Attachment
SS: CB

ORC070911-01
Control Number

Draft Environmental Impact Report (DEIR) for the Hoag Health Center Use Permit Amendment

1. Operational Emissions:

The lead agency states on pages 4.3-15 and 4.3-16 of the DEIR that although operational emissions would be significant for carbon monoxide (CO), volatile organic compounds (VOC), nitrogen oxides (NO_X) and particulate matter (PM10), the proposed project is not expected or likely to "significantly deteriorate regional air quality or contribute to significant health risk, … or lead to a violation or to contribute substantially to a violation of federal or state air quality standards to result in a cumulatively considerable net increase…" Not only does the SCAQMD disagree with this type of post hoc rationalization, it is internally inconsistent with the discussion of cumulative air quality impacts in Section 9.3.5 of the Draft EIR. In Section 9.3.5 the lead agency states that because the incremental operational emissions exceed the significance thresholds they will be significant on a cumulative basis. The SCAQMD, therefore, recommends that the inconsistent statement on page 4.3-16 be deleted.

2. Mitigating Operational Emissions:

The lead agency states on page 4.3-23 of the DEIR that there are no feasible measures that would reduce the significant operational emissions impacts to a less than significant level. Because of the magnitude of the significant adverse emissions from the proposed project's operations, the lead agency should consider the following measures, in addition to those listed on page 34 of Appendix D:

- The health center should initiate a program to convert its fleet of vehicles, either for patient delivery or deliveries of supplies and materials, to alternative-fueled vehicles or lowest emitting vehicles in that vehicle class.
- Install light-colored roofing materials to deflect heat and conserve energy.
- Install solar panels on roofs to supply electricity for air-conditioning.
- Install high energy-efficient appliances such as refrigerators, furnaces and boiler units.
- Install automatic lighting occupant sensors on/off controls.

For additional mitigation measures for the lead agency's consideration, refer to the following URL: http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html.

3. Health Risk Assessment

- The HRA for the diesel emergency backup generator is based on Rule 1470 requirements, using an emission factor of 0.01 gm/hp-hr and 12 hours of testing per year. These parameters are applicable if there is a school within 500 feet of the engine. If there are no schools within 500 feet, Rule 1470 allows the use of emergency backup generators with an emission rate of 0.15 gm/hp-hr and allows 50 hours of testing per year. If there are no schools within 500 feet of the engine, use of the more stringent parameters, is more health protective and should be required by the lead agency when submitting permit applications for the emergency backup engines to the SCAQMD, since these parameters are included as part of the project description.

- The engine parameters presented in the Air Quality Analysis include a stack diameter of 0.82 meter and a stack exit velocity of 45.4 meters per second. These stack parameters are not typical for the size of engine analyzed (800 bhp). For an 800 bhp engine the stack diameter is expected to be about 0.3 meter and the stack velocity is expected to be eight meters per second. The stack parameters used by the lead agency result in an overly optimistic health risk result. The SCAQMD requests that the HRA be revised to include the more typical stack width and exhaust velocity parameters or provide the manufactures engine specification sheet verifying the engine parameters used in the HRA in the Draft EIR.

- A site map identifying the sensitive receptor was not included in the Draft EIR. Please include a site map identifying sensitive receptors in the Final EIR.