



South Coast
Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL AND USPS:

January 15, 2016

CPerring@EastvaleCA.gov

Ms. Cathy Perring, Assistant Planning Director
Community Development Department
City of Eastvale
12361 Limonite Avenue, Suite 910
Eastvale, CA 91752

**Draft Environmental Impact Report (DEIR) for the Proposed
LBA Realty Eastvale Industrial Project (Planning Application No. 14-1077, SCH No.
2015031107)**

The South Coast Air Quality Management District (SCAQMD) 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 CEQA document.

In the project description, the Lead Agency proposes the construction of one industrial warehouse building with a building size totaling 446,173 square feet. Construction will also include the associated infrastructure and landscaping on the approximately 23.5-acre site. Additional construction will include overflow truck parking and a secondary auto access roadway on a 5.3-acre portion of a 17.56-acre parcel adjacent to the north of the proposed building site along with removal and replacement of an existing flood control conveyance channel located in the center of the property. The Lead Agency has estimated that approximately 766 total daily vehicle trips including at least 368 daily truck trips will be operating at the site. Construction is expected to take approximately 18-months beginning in June 2016 and end in December 2018. The warehouse occupants have not been identified at this time and the use of transportation refrigeration units was not assumed for analysis purposes.

In the Air Quality Section, the Lead Agency quantified the project's construction and operation air quality impacts and has compared those impacts with the SCAQMD's recommended regional and localized daily significance thresholds. In addition, a Health Risk Analysis (HRA) was prepared to estimate potential risk from the project's potential operations to nearby sensitive receptors. Based on review of the HRA, the SCAQMD staff is concerned that the errors in the HRA might result in an under-estimation of the risks of the project. The SCAQMD staff therefore recommends that the Lead Agency revise the HRA in the Final EIR. Detailed comments concerning the dispersion modeling are included in the attachment.

Cathy Perring,
Assistant Planning Director

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Pursuant to Public Resources Code Section 21092.5, the SCAQMD staff requests that the Lead Agency provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. Further, staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Jack Cheng, Air Quality Specialist, at (909) 396-2448, if you have any questions regarding the enclosed comments.

Sincerely,

Jillian Wong

Jillian Wong, Ph.D.
Program Supervisor
Planning, Rule Development & Area Sources

Attachment
JW:JC:GM

RVC151208-01
Control Number

Health Risk Assessment (HRA)

1. The lead agency used AERMOD (version 14134) to prepare the dispersion modeling for the Health Risk Assessment (HRA), which is outdated. The current version is AERMOD (version 15181), which was available at the time of analysis (12/31/2015). Therefore, SCAQMD staff recommends the lead agency revise the HRA with the current version of AERMOD.
2. The lead agency used several non-default options without justification. According to SCAQMD's modeling guidance, the use of non-default options is not recommended without prior consultation with SCAQMD staff. SCAQMD staff recommends that the lead agency revise the dispersion modeling in the HRA using the default options unless justification is provided.
 - a. The lead agency used the non-default Dispersion option of Low Wind Options, SCAQMD modeling guidance does not allow the use of the Low Wind Option.
 - b. The lead agency used the non-default Terrain Height option of Flat Terrain, SCAQMD modeling guidance requires the use of elevations.
 - c. The lead agency used the non-default Dispersion Coefficient option Rural, SCAQMD modeling guidance requires the use of the Urban Option. The rural option can be applied with justification.
3. The lead agency modeled the proposed project as a single volume source (Source S1001). The use of a single volume source creates a large exclusion zone. SCAQMD staff recommends that the lead agency follow the "*Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*" found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis> when modeling impacts from the proposed project.
4. The HRA analysis involved the use of separate discrete receptors placed randomly as well as a 600-meter spacing receptor grid. SCAQMD staff recommends that the lead agency revise the HRA using a receptor grid of no more than 100-meter spacing over the existing residences and areas zoned or planned for residential development. Furthermore, receptor locations should be placed at the boundaries of the residential property and not the residential structure. Placing receptors along the residential structure underestimates cancer impacts to the residents. SCAQMD staff recommends that the lead agency revise the model using appropriate receptor grids and locations.
5. Likewise, a similar receptor grid should be used for the worker and school receptors. The receptors grid should be at the property fence line as opposed to the building structure to ensure that the maximum impacts are properly analyzed.