



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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**Draft Subsequent Environmental Impact Report (Draft SEIR) for the Proposed
Temecula Valley Hospital Master Plan Update and
Planned Development Overlay Amendment Project (Proposed Project)
(SCH Number.: 2005031017)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The City of Temecula is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. The following comments recommended revisions to the CEQA regional air quality impacts analysis for cleanup activities during construction, overlapping construction and operation analysis, health risk assessment during construction and operation, and information about South Coast AQMD rules & permits that the Lead Agency should include in the Final EIR.

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

Based on the Draft SEIR, the Lead Agency proposes revising the approved project, which would require a Major Modification and Planned Development Overlay Amendment.¹ The Proposed Project would be revised to allow the development of the following structures: a four-story building of approximately 102,000 square feet; a five-story second hospital tower of approximately 120,000 square feet; approximately 20,000 square feet of expansion to the existing emergency department; two four-story medical office buildings of 80,000 square feet; a 14,000 square foot utility plant; an approximately 125,000 square foot five-story third hospital tower; a four-story parking structure of 80,000 square feet; and relocating the existing helistop location.² The Proposed Project would be constructed into three phases: Phase II, Phase III, and Phase IV.³ The Proposed Project is located at 31700 Temecula Parkway in the City of Temecula on a 35.31-acre site.⁴ Based on the ariel photographs, South Coast AQMD staff found that the nearest sensitive receptors (e.g., residences) are adjacent to the north of the Proposed Project's northwestern portion, approximately within 30 feet from Proposed Project boundaries. The Proposed Project's construction would be implemented over approximately 15 years⁵ and is anticipated to start Phase II in 2023 and complete Phase IV in 2037.⁶

¹ Draft SEIR. Page ES-2.

² *Ibid.*

³ *Ibid.*

⁴ *Ibid.* Page ES-3.

⁵ *Ibid.* Page 3.2-18.

⁶ *Ibid.* Page ES-2.

South Coast AQMD Staff's Comments on the Draft EIR*CEQA Regional Air Quality Impacts Analysis for Cleanup Activities during Construction*

Based on the Hazards and Hazardous Materials Section in the Draft SEIR, the Proposed Project site was reviewed for impact from Methyl Tertiary Butyl Ether (MTBE) from nearby gas station underground fuel storage tanks in the 2008 SEIR, and no detectable concentration of MTBE or Volatile Organic Compounds (VOCs) were found.⁷ However, it is possible that the contaminated soil could be further distances below the ground surface, which could be exposed during the construction activities.⁸ In the event that the contaminated soils are detected during construction, it is reasonably foreseeable that cleanup activities for remediating and controlling contaminated soil and/or groundwater may occur prior to or concurrently with the new construction. Due to the potential of contamination, the Lead Agency proposes the Mitigation Measures (MM) 3.7-1: Monitoring and Disposal of Any Contaminated Soil⁹ in the Draft SEIR. However, the Lead Agency did not analyze air quality impacts from cleanup activities during construction in the Draft EIR.

Cleanup activities will likely involve using heavy-duty, diesel-fueled trucks for soil export, resulting in emissions from truck hauling activities and vehicle trips by workers that will be required to conduct cleanup activities. Additionally, cleanup activities will likely require the use of additional equipment that may differ from typical equipment for grading and site preparation for construction. If cleanup activities were reasonably foreseeable at the time the EIR was prepared, the Lead Agency should use good faith and best efforts to provide information on the scope, types, and duration of cleanup activities, quantify emissions from cleanup activities and include those emissions in the Proposed Project's construction emissions profile to be compared to South Coast AQMD's air quality CEQA significance thresholds for construction to determine the level of significance in the Final EIR. Alternatively, if emissions from cleanup activities are not included in the Final EIR, the Lead Agency should include a new air quality mitigation measure in the Air Quality Section of the Final EIR to commit to evaluating the potential environmental impacts from cleanup activities through CEQA prior to commencing any cleanup activities. If a new air quality mitigation measure is not included in the Final EIR, the Lead Agency should provide reasons supported by substantial evidence in the record to explain why a new air quality mitigation measure is not included.

Under the Utilities and Service Systems – Solid Waste section in the Draft SEIR, the Lead Agency identifies two landfills that serve the Proposed Project, such as El Sobrante Landfill and Badlands Landfill,¹⁰ and both the El Sobrante Landfill and Badlands Landfill are located at approximately 37 miles and 48 miles away from the Proposed Project, respectively. However, the Lead Agency did not identify a specific hazardous landfill for the Proposed Project in the Draft SEIR. In addition, based on the emission calculations from the California Emissions Estimator Model (CalEEMod) output files, the Lead Agency used a one-way truck trip length of 20 miles to quantify the Proposed Project's construction emissions from hauling construction materials. If cleanup activities would include removing and disposal of contaminated soil or any hazardous materials, depending on the

⁷ *Ibid.* Page 3.7-12.

⁸ *Ibid.*

⁹ *Ibid.* Page 3.7-14.

¹⁰ *Ibid.* Page 3.14-12.

type of contamination, contaminated materials may need to be accepted at a hazardous landfill with a one-way truck trip length that is likely longer than 20 miles. Therefore, South Coast AQMD staff recommends that the Lead Agency identify the permitted hazardous disposal facility that the Proposed Project could use to dispose of contaminated soil if the cleanup activities involve transport and off-site disposal of contaminated soil and disclose the information in the Final EIR. When quantifying emissions from transportation and off-site disposal, the Proposed Project's construction emissions from haul truck trips for transporting and disposing contaminated soil based on the appropriate one-way truck trip length should be recalculated. If the default one-way truck trip length of 20 miles is not re-calculated for quantifying emissions from haul truck trips for transporting contaminated soil, the Lead Agency should provide reasons for not re-calculating it supported by substantial evidence in the record.

Overlapping Construction and Operation Analysis

Based on the Draft SEIR, the Lead Agency proposes the construction schedule of three phases. Phase II is anticipated to start construction in January 2023 and be complete in 2024.¹¹ Phase III is also anticipated to construct in January 2023 and be complete by June 2027.¹² Construction of Phase IV is anticipated to start in July 2029 and be complete by December 2037. Phase II and III construction would overlap between January 2023 and October 2024.¹³ However, South Coast AQMD staff is concerned about the overlapping between Phase II's operation and Phase III's construction; and between Phase II + Phase II's operation and Phase IV's construction. Hence, it is recommended that the Lead Agency analyze the air quality impacts during the above construction and operation overlapping time to estimate the maximum emissions, compare them to South Coast AQMD's regional air quality CEQA operational thresholds to determine the significance level, and include them in the Final EIR. If the overlapping construction and operation analysis is not included in the Final EIR, the Lead Agency should provide reasons for not having it supported by substantial evidence in the record.

Health Risk Assessment (HRA) during Construction and Operation

Operational HRA

In the Draft SEIR, the Lead Agency proposes the construction of the utility plant that will be installed in Phase III.¹⁴ The single-story central utility plant that would serve the hospital's energy needs is anticipated to include four natural gas boilers of 3 Million BTU per hour (MMBtu/h) each.¹⁵ Since these four boilers are considerably large, it is recommended that the HRA is performed using Risk Assessment for Rule 1401¹⁶ and/or air dispersion modeling with these boilers as stationary sources. The emission factors for the natural gas boilers can be obtained from either United States Environmental Protection Agency (EPA) AP-42 – Chapter 1: External Combustion Sources¹⁷ or South Coast AQMD Combustion Default Emissions Factors.¹⁸ South

¹¹ *Ibid.* Page 3.2-15.

¹² *Ibid.*

¹³ *Ibid.*

¹⁴ *Ibid.* Page 2-15.

¹⁵ *Ibid.*

¹⁶ South Coast AQMD Risk Assessment for Rule 1401. Access at: <http://www.aqmd.gov/home/permits/risk-assessment>.

¹⁷ United State EPA AP-42, Chapter 1: External Combustion Sources. Access at: <https://www3.epa.gov/ttnchie1/ap42/ch01>.

¹⁸ South Coast AQMD Combustion Default Emissions Factors. Access at: <http://www.aqmd.gov/docs/default-source/planning/annual-emission-reporting/combustion-emission-factors-2021.pdf>.

Coast AQMD staff recommends that the Lead Agency perform an HRA during operation to determine the maximum individual cancer risk (MICR), cancer burden, and non-cancer acute and chronic hazard index (HI) from the new boilers, compared to the South Coast AQMD significant thresholds of 10 in one million,¹⁹ and include the results in the Final EIR. If an HRA is not included in the Final EIR, the Lead Agency should provide reasons for not having it supported by substantial evidence in the record.

Additional HRA

In the Draft SEIR, the Lead Agency mentions that the construction of the three phases would be implemented over approximately 15 years, from 2023 to 2037.²⁰ Due to the long duration of construction activities, it is recommended that the Lead Agency perform another HRA addition to the operational HRA to cover the health risk impacts of the 15 years duration of the construction period. If an HRA is not feasible at the time due to the limited information, such as an undefined construction schedule, it is recommended that, at minimum, the Lead Agency provide a qualitative analysis that inventories and evaluates all the stationary sources (including the permitted, proposed, and planned for future units) and mobile sources with the map showing the locations of the sources, the routes to and from the site and truck loading/unloading docks (if any), and their proximity to the sensitive receptors under the currently existing and foreseeable probable future conditions and show the justifications if the Proposed Project has potentially substantial health risk impacts or not from the existing condition. If a qualitative analysis is not included in the Final EIR, the Lead Agency should provide reasons for not having it supported by substantial evidence in the record.

If the results from the qualitative analysis show the Proposed Project may have potentially significant health risk impacts, South Coast AQMD staff recommends that quantitative analysis, HRA should be conducted and compare the Proposed Project's cancer risks to South Coast AQMD CEQA significance thresholds²¹ to determine the level of significance for the Proposed Project's health risk impact in the Final EIR.²² The Lead Agency should also disclose the potential health risks for chronic and acute impacts of the Project's operation on residents living and/or workers working outside the Proposed Project's boundary in the Final EIR. If an HRA is not included in the Final EIR, the Lead Agency should provide reasons for not having it supported by substantial evidence in the record.

South Coast AQMD Permits and Responsible Agency

In the Draft SEIR, the Lead Agency proposes constructing a 14,000-square-foot utility plant with the following equipment: four natural gas-fueled boilers of (3 MMBtu/h), four electric chillers (390 kW), and four cooling towers (600 tons).²³ Since the implementation of the Proposed Project would require the use of new stationary equipment, permits from South Coast AQMD are required. The Lead Agency should ensure that these boilers comply with any South Coast AQMD applicable

¹⁹ South Coast AQMD Significance Thresholds. Access at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>.

²⁰ *Ibid.* Page 3.2-18.

²¹ South Coast AQMD Air Quality Significance Thresholds can be found at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2>.

²² South Coast AQMD's guidance for performing a mobile source health risk assessment can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.

²³ *Ibid.* Page 2-15.

rules, specifically Rule 1146.1 - Emissions of Oxides of Nitrogen from Small Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters.²⁴ The Final EIR should include a discussion on any existing and new stationary equipment requiring South Coast AQMD permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project. Any assumptions used for the stationary sources in the Final EIR will also be used as the basis for the permit conditions and limits for the Proposed Project. Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions on permits. For more general information on permits, please visit South Coast AQMD's webpage at: <http://www.aqmd.gov/home/permits>.

Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), South Coast AQMD staff requests that the Lead Agency provide South Coast AQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, 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 will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision-makers and to 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 Danica Nguyen, Air Quality Specialist, at dnguyen1@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

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Planning, Rule Development & Implementation

SW:DN

RVC221108-08

Control Number

²⁴ South Coast AQMD Rule 1146.1 - Emissions of Oxides of Nitrogen from Small Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters. Access at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1146-1.pdf>.