



October 19, 2021

Ms. Cheryl Tubbs, Vice President
LILBURN CORPORATION
1905 Business Center Drive
San Bernardino, California 92408

Dear Ms. Tubbs:

Ganddini Group, Inc. is pleased to respond to comments regarding the Final Mitigated Negative Declaration (MND) for the Proposed Cedar Avenue Truck Terminal Project (Proposed Project). The Bloomington Truck Storage Project Health Risk Assessment Analysis (HRA) was prepared by Ganddini Group, Inc. June 14, 2021. Comments from South Coast Air Quality Management (SCAQMD) were received on via email August 6, 2021 and the HRA was revised October 19, 2021.

COMMENT 1

Emission Rates from Heavy-Duty Trucks: The Final MND calculated truck running and idling emissions based on an assumption that all trucks accessing the Proposed Project would be heavy-heavy-duty trucks. Unless the Lead Agency includes a project condition or a mitigation measure to limit truck access by only heavy-heavy-duty trucks, it is reasonably foreseeable that the Proposed Project would attract light- and medium-heavy-duty trucks during operation. Since light- and medium heavy-duty trucks have higher running and idling emission rates than heavy-heavy-duty trucks, the Final MND has likely underestimated the Proposed Project's operational mobile source emissions and should be revised.

RESPONSE TO COMMENT 1

Section 3 of the HRA report was revised with the following: "Per project proponents, other than employees, the project site is anticipated to attract mainly 4+-axle trucks." The Traffic Analysis showed the project is expected to generate approximately 716 (non-passenger car equivalents) vehicle trips per day. Of those vehicle trips, for the truck storage use 144 are automobile round trips and 572 are 4+-axle truck round trips per day (non-passenger car equivalents). "However, to be conservative, respond to comments from SCAQMD,¹ and ensure that TAC emissions from 2-axle and 3-axle trucks were considered in the analysis, the truck mix for project site was revised and analyzed as: 486 4+-axle trucks (85 percent of the total 572 trucks), 69 3-axle trucks (12 percent of the total 572 trucks), and 17 2-axle trucks (3 percent of the total 572 trucks)." Using the conservative truck mix, the project's TAC emissions would not cause an exceedance of the SCAQMD MICR threshold of 10 in one million. The cancer risk to an individual born during the opening year of the project and located in the project vicinity for the entire 30-year duration, is a maximum of 7.03 in a million at receptor location 7, as shown in Table 9 of the HRA. No further analysis is required and health risk impacts remain less than significant.

COMMENT 2

Air Dispersion Modeling Parameters: In the air dispersion modeling that was performed for the Proposed Project's mobile source HRA and included in the Final MND, the Lead Agency represented all heavy-duty

¹ SCAQMD Comment letter dated August 5, 2021

trucks idling as nine discrete point sources with uniform stack parameters for each point source. Since the Proposed Project would include 260 truck parking spaces, and to account for on-site idling emissions, the Lead Agency should use a series of volume sources or provide more information to justify the use of nine point sources with the uniform point source input parameters for modeling emissions from truck idling.

RESPONSE TO COMMENT 2

As shown in Figure 3 of the HRA report, the analysis included off-site truck travel emissions, on-site truck travel emissions (using a series of line volume sources) and ten (10) locations on-site where idling could occur modeled as point sources. The idling locations were located at the driveway entrance to the project site, at the guard shack, in the travel aisles next to the parking spaces (where idling may occur throughout the site as trucks maneuver into the parking spots), and adjacent to the truck service area. Therefore, line volume sources were already included in the analysis to account for on-site truck emissions from vehicles traversing the site and the idling locations were accurately modeled as point sources (as the vehicles would be stopped and act more like point sources at these locations). The HRA report was revised to calculate the emissions from: 486 4+-axle trucks (85 percent of the total 572 trucks), 69 3-axle trucks (12 percent of the total 572 trucks), and 17 2-axle trucks (3 percent of the total 572 trucks). The release height of 3.5 meters (11.47 feet) for the line volume sources was based on the haul road calculator function within AERMOD using the average truck vehicle height of 13.5 feet and average truck width of 8.5 feet. As stated, and shown above, the project proponent anticipates mainly 4+-axle trucks (at least 85 percent) at the project site. However, as the project could attract smaller trucks with various exhaust stack heights, the stack release height for idling of 11.21 feet was based on the weighted average for the truck types and the exhaust height of 12.6 feet for HHDT trucks and 0.6 feet for MHDT and LHDT trucks. The exhaust stack height source was obtained from the Guidance for Air Dispersion Modeling, San Joaquin Valley Air Pollution Control District (08/06 Rev 1.2), Page 76.² BPIP was run in AERMOD prior to the AERMOD calculation run, so building downwash has already been accounted for. Taking all of the above factors into account, the project's operational TAC emissions remain less than significant and no mitigation is needed.

COMMENT 3

Recommended Air Quality Mitigation Measures: The Final MND did not include air quality mitigation measures. Due to the Proposed Project's close proximity to existing receptors, mitigation measures and design features should be included to reduce air quality and health risk impacts from mobile sources (e.g., trucks) and area sources to nearby sensitive receptors.

RESPONSE TO COMMENT 3

As stated above, the TAC emissions from project operation do not exceed the 10 in a million MICR threshold. Furthermore, the non-cancer risk threshold was also not exceeded. Therefore, mitigation measures are not warranted or required. Impacts remain less than significant.

COMMENT 4

South Coast AQMD Permits and Responsible Agency: The Proposed Project will include operation of a maintenance facility on-site, with four maintenance bays. If operations include on-site fueling, a permit from South Coast AQMD would be required, and South Coast AQMD should be identified as a Responsible Agency for the Proposed Project.

² Source: http://www.valleyair.org/busind/pto/tox_resources/Modeling%20Guidance.pdf

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RESPONSE TO COMMENT 4

The project only includes a maintenance facility on-site and does not include any on-site fueling facility. Therefore, a permit from SCAQMD to operate a fueling facility would not be required. No further analysis is warranted or required.

CONCLUSION

It has been a pleasure to service your needs on the proposed Bloomington Truck Storage Project. Should you have any questions or if we can be of further assistance, please do not hesitate to call at (714) 795-3100 x 202.

Sincerely,
GANDDINI GROUP, INC.

A handwritten signature in black ink that reads "Katie Wilson". The signature is written in a cursive, flowing style.

Katie Wilson, M.S.
Senior Air Quality Analyst