



South Coast Air Quality Management District

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August 13, 2013

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City of Redlands
210 E. Citrus Ave.
Redlands, CA 92373

Review of the Draft Mitigated Negative Declaration (MND) for the Hillwood Fulfillment Center Project

We appreciate your sending a response to our comments on the Draft MND for this project. Please excuse this brief response. We did not receive your response to our comments until today as we are closed on Mondays and your email was sent to us on Saturday. Please forward these comments along to appropriate decision makers on this project.

We remain concerned about the methods used to analyze air quality impacts and that the responses provided to our comments are largely unsubstantiated. We originally commented that the number of truck trips and the miles each truck would travel were not supported by any evidence in the record. As you are aware, emissions from diesel trucks are directly related to the number of miles they travel, and NO_x and diesel particulate matter emissions from trucks present serious air quality problems in our basin. Although a traffic study was conducted for the MND for this project, it did not include any supporting information regarding the unsubstantiated trip rates and lengths. The response to comments contains similar conclusory statements as the MND such as "The project is a Fulfillment Center, and would not have an excessive amount of truck traffic.", without any evidence to back up this claim. Although the response claims this project will be similar to others, no evidence is provided that shows the trip rates or trip lengths of those other projects.

Further, while the response to our comments states that the 150 mile trip distance cited in the Draft MND is an error, it does not provide the new trip length, nor a rationale for how it was chosen. As previously stated in our comment letter, the CalEEMod default trip length is not an appropriate value for goods movement land uses.

If the lead agency believes that these low trip rates and trip lengths are correct, then a condition should be placed on the project that limits the daily activity to what was analyzed in the Draft MND (allowing for a reasonable margin of error). Absent a condition of this kind, the lead agency has not provided substantial evidence that air quality impacts would be less than significant.

Lastly, we appreciate that the project appears to include mitigation requiring only trucks meeting 2010 emission standards access the site. However it is not clear that this mitigation is enforceable as written. For example, how will the applicant ensure that third party trucking operators, such as the USPS, Fed-Ex, UPS, trucking companies, and independent owner/operators will comply with this requirement?

We believe these issues are resolvable, however the documents made available to our agency indicate that the current MND does not provide adequate evidence to support its determination of a less than significant air quality impact.

Should you have any questions, don't hesitate to contact me at (909) 396-3244.

Sincerely,

A handwritten signature in black ink that reads "Ian V. MacMillan". The signature is written in a cursive style with a large, stylized 'I' and 'M'.

Ian MacMillan
Program Supervisor, CEQA Inter-Governmental Review
Planning, Rule Development & Area Sources

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