

**APAC ENVIRONMENT STANDING COMMITTEE REPORT**  
**PROJECT FRONTIER AIR QUALITY AND HEALTH REQUIREMENT REVIEW – April 19, 2023**  
**Principal Reviewers: David Yin, plus anonymous contributors**

PROJECT APPLICATION INCONSISTENCY WITH BASE-LEVEL CEQA REQUIREMENTS

Project Frontier will bring tremendous air pollution to El Dorado Hills, especially to communities with thousands of residential houses and schools nearby. According to the Project Frontier traffic analysis, the facility entails 1250 truck trips daily, 24/7, year-round. Diesel trucks emit nitrogen oxides, which are primary precursors to smog formation and a significant factor in developing respiratory problems like asthma, bronchitis, and lung irritation, and toxic diesel particulate matter, which contributes to cancer, heart disease, respiratory illnesses, and premature deaths. In addition, the project may potentially cause violating the United States Clean Air Act, which puts the State of California and the County of El Dorado at risk of significant financial losses.

In "March 14, 2023 Applicant Responses to EDH APAC Feb 16, 2023, TAC Meeting Comments Letter" (<https://edhapac.org/documents/project-frontier-dr22-0003-cup22-0016>), Project Frontier states, "The project applicant is not seeking ministerial approval" (Answer to Question 1). If it is not a ministerial project, it is a discretionary project. Therefore, California Environmental Quality Act (CEQA) fully applies to this project. Project Frontier response letter (Questions 5.1 and 5.3) states, "An environmental consultant is currently preparing a comprehensive California Environmental Quality Act ("CEQA") consistency analysis...to ensure there is no new information that was not known when the prior EIRs were certified". This type of "conformance" analysis can only be used for ministerial projects, according to CEQA, and cannot be used for discretionary projects.

To comply with CEQA, the Project Frontier applicant must conduct studies to inform decision-makers and the public whether the project results in significant environmental impacts. The project hasn't done and doesn't plan to do (based on the above-quoted letter) proper environmental impact studies, which violates CEQA.

AIR QUALITY ANALYSIS DEFICIENCIES AND REQUIRED STEPS

Project Frontier must fully analyze all reasonably foreseeable project impacts, including cumulative ones. When analyzing cumulative impacts, the project should thoroughly consider its incremental impact in combination with the past and current conditions (a US Clean Air Act requirement) and other reasonably foreseeable future projects.

The steps to establish the past and current conditions include:

1. The past and current air quality measurement data for gaseous and particle pollutants, such as nitrogen oxides, ozone, and speciated particulate matter (to show past and present pollution levels) for at least five consecutive years. Ideally, these measurements should be done in the adjacent communities with the US Environmental Protection Agency-certified instrumentation and meet the measurement site requirements;
2. A survey of current and future air pollutants and their precursors' emissions in the areas;
3. Multiple-year local meteorological data, observational and model generated, site-specific for the project area.

The project needs to prepare quantitative air quality studies to demonstrate the pollution levels once the facility is up and running. These studies should include, but not limit to:

1. State-of-the-art dispersion modeling of the diesel particulate matter and other pollutant hotspots due to the project;
2. State-of-the-art chemical transport modeling to demonstrate National Ambient Air Quality Standards for criteria pollutants won't be violated due to this project.

These modeling studies should cover at least a full-year period.

#### HEALTH RISK ANALYSIS BASELINE AND DIESEL DEATH ZONES

Project Frontier needs to prepare a quantitative health risk assessment in accordance with the California Office of Environmental Health Hazard Assessment. It should include, but not be limited to:

1. Cancer risk due to the project in El Dorado Hills and nearby communities and schools;
2. Cardiopulmonary disease risk attributed to the project;
3. Asthma attacks and other hospitalizations attributed to the project;

The project needs to incorporate the public health costs based on the quantitative health risk assessment into its economics analysis to give a full picture of the project's economic impacts.

#### CITIZEN AND AGENCY ENGAGEMENT

The project should actively engage the community via meetings, posts, etc., and provide ample opportunities for residents to provide suggestions and address concerns.

The California Attorney General's Bureau of Environmental Justice reviews proposed warehouse projects specifically for compliance with CEQA. We encourage El Dorado County to work with the California Attorney General's Office to avoid potential legal issues.

#### REFERENCE DOCUMENTS AND ADDITIONAL COMMENTARY

In Application-Packet\_CUP22-0016.pdf, page 3, second paragraph:

Because of the project's tremendous heavy-duty truck trips and their associated diesel exhausts, a project of this scale is known to have significant environmental impacts that cannot be mitigated (<https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health>). Based on the statements here, an EIR is required.

In Application-Packet\_CUP22-0016.pdf, page 14:

Under "Air Quality", the applicant failed to disclose significant air pollution associated with the truck traffic and distribution center's operation.