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**REVIEW OF SAFER COMMENT FOR 15172 GOLDENWEST CIRCLE  
PROJECT - ADDITIONAL INFORMATION RELATED TO RESPONSE TO  
AIR QUALITY AND GREENHOUSE GAS IMPACTS**

Dear Mr. Cataldo:

Date: April 23, 2026

Ramboll Americas Engineering Solutions, Inc. (Ramboll) has prepared this analysis regarding the air quality comments submitted regarding the 15172 Goldenwest Circle Project ("Project"; ArtiCraft Cabinetry Facility, 15172 Goldenwest Circle, Proposed Final Initial Study and Mitigated Negative Declaration [IS/MND]; Case No. 2024-0160). This letter provides additional information related to the responses to the Supporters Alliance For Environmental Responsibility ("SAFER") comment letter dated November 11, 2025 ("SAFER comment letter"), specific to air quality impacts from construction activities.

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**INTRODUCTION**

The SAFER comment letter referred to its Exhibit A, the July 15, 2025 letter from Soil, Water, Air Protection Enterprise ("SWAPE"), and Exhibit B, the July 30, 2025 letter from Patrick Sutton, P.E., of Baseline Environmental Consulting, regarding the IS/MND for the Project. The SAFER comment letter claimed that the IS/MND did not adequately analyze the Project's air quality impacts and that these unmitigated impacts may be significant.

The information in this memo clarifies and adds to the prior responses to comments but does not change the overall analysis or conclusions. These comments do not require any changes to the IS/MND.

**RESPONSE TO COMMENTS**

The comment letter incorrectly asserts that the IS/MND fails to adequately analyze the Project's air quality impacts, as a health risk analysis ("HRA") was not conducted to verify that the Project's construction emissions would not create a significant health risk to sensitive receptors approximately 300 feet away from the Project Site, and states that an Environmental Impact Report ("EIR") should be prepared to adequately assess and mitigate the Project's health risk impacts.

The commenter asserts that not conducting an HRA for construction emissions is contrary to the Office of Environmental Health Hazard Assessment's ("OEHHA")

guidance for preparing health risk assessments.<sup>1</sup> Note however, that Section 8.2.10 of the OEHHA guidance which was cited by the commenter states:

*"The local air pollution control districts **sometimes** use the risk assessment guidelines for the Hot Spots program in permitting decisions for short-term projects such as construction or waste site remediation.*

*Cancer potency factors are based on animal lifetime studies or worker studies where there is long-term exposure to the carcinogenic agent. **There is considerable uncertainty in trying to evaluate the cancer risk from projects that will only last a small fraction of a lifetime.**" [emphasis added]*

The air pollution control district having jurisdiction over the proposed Project is the South Coast Air Quality Management District ("SCAQMD"). SCAQMD policy and guidelines focus on addressing potential emissions of air toxics and associated cancer risk from the operational phase of projects,<sup>2,3</sup> rather than construction activities. The duration of Project construction activities is 14 months, which represents approximately 1.7% of the 70-year lifetime averaging period assumed by OEHHA.<sup>4</sup> The pollutant of primary concern for potential health impacts from construction emissions is diesel particulate matter ("DPM"). Because of the highly dispersive properties of DPM, concentrations decrease by approximately 60 percent at a distance of around 300 feet (100 meters), per Zhu et al. 2002.<sup>5</sup> As discussed in the IS/MND, the closest residences are more than 300 feet from the Project perimeter. Additionally, construction activities are anticipated to occur throughout the Project Site and therefore much of the construction emissions would occur at distances greater than 300 feet from the nearest residence. Therefore, the impact of these already low emissions (an average of 0.59 pounds per day of DPM) would be expected to be substantially less. This, combined with the relatively small exposure duration representing a small fraction of the lifetime averaging period, supports the conclusion that construction-related emissions are not anticipated to expose sensitive receptors to substantial concentrations of toxic air contaminants and therefore a quantitative HRA was not necessary for the proposed Project.

The comment letter incorrectly characterizes the Project's air quality impacts as significant. Exhibit B of the letter details a quantitative HRA for Project-level construction activities and compares the results to the City of San Francisco Planning Department ("SFPD")'s cancer risk threshold of 7 in 1 million as well as proposed Cumulative Significance Thresholds discussed during a working group meeting by SCAQMD in November of 2024.<sup>6</sup> However, neither of these significance thresholds are applicable to the proposed

<sup>1</sup> OEHHA 2015. *Air Toxics Hot Spots Program: Guidance Manual for Preparation of Health Risk Assessments*. February. Available: <https://oehha.ca.gov/sites/default/files/media/downloads/crn/2015guidancemanual.pdf>. Accessed April 2026.

<sup>2</sup> SCAQMD, 2024. *Working Group Meeting #6 Cumulative Impacts from Air Toxics for CEQA Projects*. November 6. Available: [https://www.aqmd.gov/docs/default-source/ceqa/documents/wgm-6-20241106.pdf?sfvrsn=405a8561\\_13](https://www.aqmd.gov/docs/default-source/ceqa/documents/wgm-6-20241106.pdf?sfvrsn=405a8561_13). Accessed April 2026.

<sup>3</sup> SCAQMD, 2024. *RISK ASSESSMENT PROCEDURES for Rules 1401, 1401.1, and 212*. October 31. Available: [https://www.aqmd.gov/docs/default-source/permitting/hra-procedures/hraprocedures9-0\\_103124.pdf?sfvrsn=ee5e8561\\_10](https://www.aqmd.gov/docs/default-source/permitting/hra-procedures/hraprocedures9-0_103124.pdf?sfvrsn=ee5e8561_10). Accessed April 2026.

<sup>4</sup> OEHHA 2015. *Air Toxics Hot Spots Program: Guidance Manual for Preparation of Health Risk Assessments*. February.

<sup>5</sup> Zhu, Y., W. C. Hinds, S. Kim, and S. Shen. 2002. *Study of Ultrafine Particles Near a Major Highway with Heavy-duty Diesel Traffic*. In *Atmospheric Environment* 36:4323-4335.

<sup>6</sup> SCAQMD, 2024. *Working Group Meeting #6 Cumulative Impacts from Air Toxics for CEQA Projects*. November 6.

Project. The Project Site is located in Westminster, California, which is approximately 400 miles south of San Francisco and not under the jurisdiction of SFPD. Additionally, proposed significance thresholds under discussion by SCAQMD are designed to assess the cumulative impacts from project operational air toxic emissions for major industrial, transportation and planning projects. These significance thresholds are not applicable to the proposed Project, and have not been adopted. The applicable SCAQMD significance threshold to evaluate the impacts of the proposed Project is 10 in 1 million.<sup>7</sup> The cancer risk estimated by the commenter is 7.9 in 1 million, which is below the applicable significance threshold. It should also be noted that this estimate of cancer risks from construction emissions is expected to be overstated, as the emissions from the Project summarized within the IS/MND do not account for Mitigation Measure 3, which establishes a preference for contractors to use heavy equipment that is Tier 3 or better rated, which would reduce emissions of DPM.

In summary, the IS/MND fully and accurately evaluates and discloses the Project's air quality impacts. Both construction and operational emissions are less than significant, and therefore neither additional mitigation measures nor the development of an EIR are warranted. Given the low emissions magnitude and the limited construction activity and duration, a quantitative HRA is not necessary to establish that construction-related emissions from the Project are not anticipated to expose sensitive receptors to substantial concentrations of toxic air contaminants. This conclusion is corroborated by the commenter's own conservatively modeling, which yields an estimated cancer risk below the applicable 10 in 1 million cancer risk threshold.

Please feel free to contact the undersigned if you have any further questions. Thank you for the opportunity to assist you with these matters.

Sincerely,



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<sup>7</sup> SCAQMD, 2023. *South Coast AQMD Air Quality Significance Thresholds*. March. Available: [https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf?sfvrsn=f7601d61\\_25](https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf?sfvrsn=f7601d61_25). Accessed April 2026.