



South Coast Air Quality Management District

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SENT VIA USPS AND E-MAIL:

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Draft Environmental Impact Report (Draft EIR) for the Proposed Southwest Fontana Logistics Center (“Proposed Project”) (SCH: 2016091057)

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final EIR.

SCAQMD’s 2016 Air Quality Management Plan

On March 3, 2017, the SCAQMD’s Governing Board adopted the 2016 Air Quality Management Plan (2016 AQMP), which was later approved by the California Air Resources Board of Directors on March 23rd. The 2016 AQMP¹ is a regional blueprint for achieving air quality standards and healthful air in the South Coast Air Basin (Basin). Built upon the progress in implementing the 2007 and 2012 AQMPs, the 2016 AQMP provides a regional perspective on air quality and lays out the challenges facing the Basin. The most significant air quality challenge in the Basin is to reduce an additional 45 percent reduction in NOx emissions in 2023 and an additional 55 percent reduction in NOx emissions beyond 2031 levels for ozone attainment.

SCAQMD Staff’s Summary of Project Description

The Lead Agency proposes to construct and operate a high-cube warehouse totaling 1,628,936 square feet (sf) on 73.3 acres and a 17.45-acre park (Proposed Project). Based on a review of aerial photographs, the Proposed Project is bounded by residential uses to the north, east, and south, and industrial uses to the west.

Air Quality and Health Risk Assessment (HRA) Analyses

In the Air Quality Section, the Lead Agency quantified the Proposed Project’s construction and operational emissions and compared them to SCAQMD’s regional and localized air quality CEQA significance thresholds. The air quality analysis was based on approximately 5,938 total vehicle trips, including 2,319 daily diesel truck trips². The Lead Agency found that regional operational NOx emissions are significant and unavoidable after incorporating mitigation measures MM-1 through MM-3. Additionally, the Lead Agency performed a HRA and found that the Maximum Exposed Individual Resident cancer risk would be 1.9 in one million which is below SCAQMD’s CEQA significance threshold of 10 in one million for cancer risk³.

SCAQMD staff has concerns about the air quality and HRA analyses in the Draft EIR. The analysis utilized assumptions which have likely led to an under-estimation of the Proposed Project’s health risks.

¹ South Coast Air Quality Management District. March 3, 2017. *2016 Air Quality Management Plan*. Available at: <http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan>.

² Appendix D-1 – Air Quality and Greenhouse Gas Analysis.

³ Appendix D-2 – Health Risk Assessment.

Details are included in the attachment. Additionally, as described above, achieving NOx emission reductions in a timely manner is critical to attaining the National Ambient Air Quality Standard (NAAQS) for ozone before the 2023 and 2031 deadlines. SCAQMD is committed to attain the ozone NAAQS as expeditiously as practicable. Therefore, SCAQMD staff recommends additional mitigation measures to further reduce the significant operational NOx emissions. Please see the attachment for more information.

Pursuant to the California Public Resources Code Section 21092.5 and CEQA Guidelines Section 15088, SCAQMD staff requests that the Lead Agency provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final EIR.

SCAQMD staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Jack Cheng, Air Quality Specialist, CEQA IGR Section, at (909) 396-2448, if you have any questions regarding the enclosed comments.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment
LS:JC
SBC170905-02
Control Number

ATTACHMENT

Health Risk Assessment

1. Emission factors from the year 2020 was used to represent the long-term, 30-year evaluation period. However, the Proposed Project will be operational in 2018, and year 2020 was selected as a “reasonable balance.”⁴ The most recent 2015 revised Office of Environmental Health Hazard Assessment (OEHHA) Guidance⁵ acknowledges that children are more susceptible to the exposure to air toxics and has revised the way cancer risks are estimated to take this into account. Since the emissions from the Proposed Project-generated trucks get cleaner with time due to existing regulations, it would not be appropriate to average out the emissions over the 30-year exposure duration since this would underestimate the health risks to children who would be exposed to higher DPM concentrations during the early years of project operation. Therefore, the SCAQMD staff recommends that the DPM emissions for each year of operation be applied to each of the corresponding age bins (i.e. emissions from Year 1 of project operation (2018) should be used to estimate cancer risks to the third trimester to 0 year age bin; Year 1 and 2 of project operation should be used to estimate the cancer risks to the 0 to 2 years age bins; and so on).
2. The Lead Agency used the “highest of T7-Tractor, T7-NOOS, and T7-Public trucks⁶” to estimate Heavy Heavy-Duty (HHD) diesel truck emissions. EMFAC2014 includes 16 T7 HHD truck categories with varying emission rates. SCAQMD staff recommends using T7 HHD truck categories to estimate emissions from HHD diesel trucks or providing additional information to justify the use of T7-Tractor, T7-NOOS, and T7-Public trucks categories in the Final EIR.
3. The Lead Agency used the non-default Dispersion Coefficient option Rural in the dispersion modeling. SCAQMD modeling guidance requires the use of the Urban Option. SCAQMD staff recommends that the Lead Agency revise the HRA using the Urban Option or provide an explanation for justifying the use of the Rural Option.
4. Onsite truck idling (STCK23-STCK69) was modeled as 31 point sources. On-site idling sources should span the entire docking area. SCAQMD staff recommends that the Lead Agency revise the HRA using a volume source that spans the entire docking area to ensure that impacts from onsite truck idling are properly analyzed.
5. Onsite and offsite travel line volume sources have varying plume heights (2.59 meters to 11.9 meters). SCAQMD staff recommends that the Lead Agency use a release height representative of heavy duty truck travel or provide justification for the plume height.
6. Sources W2H1-W2H45 have a plume release height of 11.9 meters (39 feet). Using a higher release height may affect plume dilution and dispersion, which may have likely underestimated air quality impacts and health risks. SCAQMD staff recommends that the Lead Agency use a plume release height representative of heavy duty truck travel or provide justification for using 11.9 meters as the plume release height.
7. All receptor “Flagpole Heights” were set to 2 meters. The SCAQMD modeling guidance advises that all receptors should be set to a height of 0.0 meters (default), so that ground-level

⁴ Appendix D-2 – Health Risk Assessment – Page 13.

⁵ Office of Environmental Health Hazard Assessment. March 6, 2016. *Air Toxics Hot Spots Program Guidance Manual for the Preparation of Health Risk Assessments 2015*. Available at: <https://oehha.ca.gov/air/cnr/notice-adoption-air-toxics-hot-spots-program-guidance-manual-preparation-health-risk-0>.

⁶ Appendix D-2 – Health Risk Assessment – Page 13.

concentrations are analyzed.⁷ SCAQMD staff recommends that the Lead Agency revise the HRA and use the default 0.0 meter flagpole height or provide a rationale to justify the assumptions used.

8. The HRA analysis involved the use of separate discrete receptors placed randomly. SCAQMD staff recommends that the Lead Agency use a receptor grid of no more than 100-meter spacing over the existing residences and areas zoned or planned for residential development, in order to ensure that the maximum impacts to a residential receptor are properly analyzed. Receptor locations should be placed at the boundaries of the residential property and not on the residential structure since residents have the potential to spend time outdoors (recreation, dining, etc.). Placing receptors on the residential structure will likely underestimate potential cancer risks. Therefore, SCAQMD staff recommends that the Lead Agency revise the HRA modeling and start the receptor grid at the property boundaries to ensure potential maximum concentrations are identified.
9. The Lead Agency used AERMOD (version 15181) to conduct the HRA on September 29, 2016. AERMOD 16216r was released and available on August 3, 2016. When revising the HRA analysis based on the comments above, SCAQMD staff recommends that the Lead Agency use the most recent version of AERMOD (version 16216r⁸).

Additional Mitigation Measures for Operational Air Quality Impacts (Mobile Sources)

10. CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant impacts. To further reduce the significant operational NO_x emissions from the Proposed Project, SCAQMD staff recommends incorporating the following on-road mobile-source truck related mitigation measures in the Final EIR. For more information on potential mitigation measures as guidance to the Lead Agency, please visit SCAQMD's CEQA Air Quality Handbook website⁹.

MM-4: Require the use of 2010 and newer haul trucks (e.g., material delivery trucks and soil import/export). In the event that that 2010 model year or newer diesel haul trucks cannot be obtained, provide documentation as information becomes available and use trucks that meet EPA 2007 model year NO_x emissions requirements¹⁰, at a minimum. Additionally, consider other measures such as incentives, phase-in schedules for clean trucks, etc.

MM-5: Provide electric vehicle (EV) charging stations for trucks (see the discussion below regarding EV charging stations).

- Trucks that can operate at least partially on electricity have the ability to substantially reduce the significant NO_x impacts from this project. Further, trucks that run at least partially on electricity are projected to become available during the life of the project as discussed in the

⁷ South Coast Air Quality Management District. <http://www.aqmd.gov/home/library/air-quality-data-studies/meteorological-data/modeling-guidance>.

⁸ U.S. EPA. January 17, 2017. Available at: <https://www.epa.gov/scram/air-quality-dispersion-modeling-preferred-and-recommended-models>.

⁹ South Coast Air Quality Management District. <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.

¹⁰ Based on a review of the California Air Resources Board's diesel truck regulations, 2010 model year diesel haul trucks should have already been available and can be obtained in a successful manner for the project construction California Air Resources Board. March 2016. Available at: <http://www.truckload.org/tca/files/ccLibraryFiles/FileName/00000003422/California-Clean-Truck-and-Trailer-Update.pdf> (See slide #23).

2016-2040 Regional Transportation Plan/Sustainable Communities Strategy¹¹. It is important to make this electrical infrastructure available when the project is built so that it is ready when this technology becomes commercially available. The cost of installing electrical charging equipment onsite is significantly cheaper if completed when the project is built compared to retrofitting an existing building. Therefore, SCAQMD staff recommends that the Lead Agency require the Proposed Project include the appropriate infrastructure to facilitate sufficient electric charging for trucks to plug-in. Similar to the City of Los Angeles requirements for all new projects, SCAQMD staff recommends that the Lead Agency require at least 5% of all vehicle parking spaces (including for trucks) include EV charging stations¹². Further, electrical hookups should be provided at the onsite truck stop for truckers to plug in any onboard auxiliary equipment. At a minimum, electrical panels should appropriately sized to allow for future expanded use.

Additional Mitigation Measures for Operational Air Quality Impacts (Other Area Sources)

11. In addition to the mobile source mitigation measures identified above, the Lead Agency should incorporate the following onsite area source mitigation measure below to further reduce the Proposed Project's operational air quality impacts from NOx emissions.

MM-6: Require use of electric lawn mowers and leaf blowers

¹¹Southern California Association of Governments. Adopted April 7, 2016. Available at: <http://scagrtpscscs.net/Pages/default.aspx>.

¹²City of Los Angeles. March 30, 2017. Accessed at: http://ladbs.org/LADBSWeb/LADBS_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf.