



# 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 Bloomington Industrial Facility**

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.

The lead agency proposes the construction and operation of a 678,983 square foot (sf) high-cube warehouse on an approximately 34.5 acre site. The Draft EIR estimates approximately 232 daily diesel truck trips and 1,137 total daily vehicle trips. In the Air Quality Section, the lead agency quantified the project's construction and operation air quality impacts and has compared those impacts with the SCAQMD's recommended regional and localized daily significance thresholds. The lead agency determined that localized and regional daily construction and operation emissions are less than significant.

The lead agency also conducted a Health Risk Assessment (HRA) to determine the long-term air quality impacts from vehicles operating at the proposed project. The HRA found that maximum cancer risk from the project is 4.92 in one million, which is less than the SCAQMD significance threshold of 10 in one million. The SCAQMD staff has concerns about the assumptions used in the modeling, which likely underestimates the health risks. Details are included in the attachment.

Pursuant to Public Resources Code Section 21092.5, SCAQMD staff requests that the lead agency provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. Further, 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 Section, at (909) 396-2448, if you have any questions regarding the enclosed comments.

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.

Planning & Rules Manager

Planning, Rule Development & Area Sources

JW:LS:JC

SBC161227-04

Control Number

## ATTACHMENT

### Air Quality Analysis

1. Since the project includes demolition, the lead agency must comply with SCAQMD Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities. Please provide additional information regarding compliance with SCAQMD Rule 1403 in the Final EIR.

### Daily Truck Trip Rate

2. SCAQMD staff recommends the lead agency limit the daily number of trucks allowed at the facility to levels analyzed in the Final EIR. If higher daily truck volumes are anticipated to visit the site, the lead agency should commit to re-evaluating the project through CEQA prior to allowing this land use or higher activity level.

### Health Risk Assessment (HRA) Analyses

3. The SCAQMD staff is concerned that the HRA has potentially underestimated the cancer risk from the proposed project. In the HRA, the lead agency used the AERMOD dispersion model to estimate DPM concentrations from the diesel vehicles generated by the proposed project and used the 2015 revised OEHHA guidelines to estimate the health risks to both residents and schools in the project vicinity. SCAQMD staff recommends the lead agency revise the HRA based on the following comments:
  - a. The lead agency used the Terrain Height Option “Non-Default Regulatory Option – Flat” in AERMOD. SCAQMD staff recommends that the lead agency revise the Health Risk Assessment (HRA) using the Regulatory Default Option “Elevated” or provide additional justification for the use of “Non-Default Regulatory Option.” The use of National Elevation Dataset (NED) 1 arc-second or DEM 7.5 minute terrain data is recommended if using the “Elevated” setting.
  - b. The lead agency used meteorological data from the SCAQMD’s San Bernardino station, which is located approximately 8.11 miles away from the Project site, while the SCAQMD’s Fontana and Rubidoux meteorological station are located approximately 6.5 and 3.5 miles away, respectively, from the project site. SCAQMD staff recommends that the lead agency revise the air quality modeling using a meteorological station that is more representative of the area and provide justification for its usage.
  - c. The HRA analysis involved the use of a 100-meter spacing receptor grid over the existing residences and schools. However, as modeled, the receptor grid may miss potential peak concentration locations along the property boundaries. SCAQMD staff recommends that the lead agency revise the model and start the grid at the property boundaries to ensure potential maximum concentrations are identified.
  - d. Some of the receptors were placed within the volume source exclusion zone and their results would be invalid. Since there are modeled volume sources which extend beyond the Project boundary, care should be taken to ensure that no receptors are placed within the volume source exclusion zone.

- e. On-site and off-site truck movement sources were modeled using separated line 2W volume sources instead of adjacent line volume sources. SCAQMD staff recommends revising the HRA in the Final EIR using adjacent line volume sources and following the U.S. EPA's haul road methodology when modeling the on-site and off-site truck movement.
- f. Line volume source SLINE – (On-Site Circulation) and SLINE2 (Off-Site Travel) were modeled with a release height of 8.37 feet, which is low for the exhaust stack of diesel trucks. The lead agency should provide a rationale to justify their assumption.
- g. On-site idling sources were modeled as elevated Area Sources (Initial Vertical Dimension = 3.01 m). SCAQMD staff recommends that the lead agency revise the HRA using a line volume that spans the entire docking area or provide rationale to justify the modeling assumption.
- h. The Transportation and Circulation report indicates that 70% of truck trips will travel north along Cedar Ave. The remaining 30% of truck trips will travel south along Cedar Ave. The HRA and dispersion modeling does not account for southbound truck traffic emissions. SCAQMD staff recommends including a southbound emissions source in the revised HRA.
- i. DPM emissions were calculated based on EMFAC2014 PM2.5 exhaust emissions. SCAQMD staff recommends using EMFAC2014 PM10 exhaust emissions since PM10 exhaust emissions are more conservative.
- j. In the HRA, the lead agency averaged the DPM emissions for the 30-years of exposure and used that emission rate to estimate health risks. This is not an appropriate methodology to estimate emissions using the 2015 revised OEHHA guidelines. The 2015 revised OEHHA guidelines acknowledge that children are more susceptible to the exposure to air toxics and have revised the way cancer risks are estimated to take this into account. Since the emissions from the 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, 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 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).

#### **Potential Mitigation Measures**

- 4. CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate these impacts. Pursuant to CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. In the event that the project generates significant adverse air quality impacts, information on mitigation measures as guidance to the lead agency are available on the SCAQMD CEQA Air Quality Handbook website:  
<http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>

Additional potential mitigation measures for the lead agency to consider may include the followings:

- a. Require the use of 2010 compliant diesel trucks, or alternatively fueled, delivery trucks (e.g., food, retail and vendor supply delivery trucks) at commercial/retail sites upon project build-out. If this isn't feasible, consider other measures such as incentives, phase-in schedules for clean trucks, etc.
- b. Have truck routes clearly marked with trailblazer signs, so that trucks will not enter residential areas.
- c. Limit activities to the amounts analyzed in the Draft CEQA document.
- d. Promote clean truck incentive programs (see the discussion above regarding Cleaner Operating Truck Incentive Programs), and
- e. Provide electric vehicle (EV) Charging Stations (see the discussion below regarding EV charging stations).
- f. Should the proposed project generate significant regional emissions, the lead Agency should require mitigation that requires accelerated phase-in for non-diesel powered trucks. For example, natural gas trucks, including Class 8 HHD trucks, are commercially available today. Natural gas trucks can provide a substantial reduction in health risks, and may be more financially feasible today due to reduced fuel costs compared to diesel. In the Final CEQA document, the lead Agency should require a phase-in schedule for these cleaner operating trucks to reduce project impacts. SCAQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the lead Agency and project applicant.
- g. Trucks that can operate at least partially on electricity have the ability to substantially reduce the significant NOx 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 2012 Regional Transportation Plan. 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, the SCAQMD staff recommends the lead Agency require the proposed warehouse and other plan areas that allow truck parking to be constructed with 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, the SCAQMD staff recommends that the lead Agency require at least 5% of all vehicle parking spaces (including for trucks) include EV charging stations.<sup>1</sup> 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.

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<sup>1</sup> [http://ladbs.org/LADBSWeb/LADBS\\_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf](http://ladbs.org/LADBSWeb/LADBS_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf)