



# 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 Duke Warehouse ("Proposed Project") (SCH: 2017011061)**

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 23<sup>rd</sup>. The 2016 AQMP<sup>1</sup> 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.

### Project Description

The Lead Agency proposes to construct and operate a high-cube (non-refrigerated) warehouse totaling 668,681 square feet (sf) on 34.57 acres ("Proposed Project"). Based on a review of aerial photographs, the Proposed Project is bounded by industrial uses to the north and east, and vacant land to the south and 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 1,124 total vehicle trips, including 230 daily diesel truck trips<sup>2</sup>. The Lead Agency found that regional operational NOx emissions are significant and unavoidable after incorporating mitigation measures (MM) AQ 1 and MM AQ 2. Additionally, the Lead Agency performed a HRA and found that the Maximum Exposed Individual Resident cancer risk would be 2.4 in one million which is below SCAQMD's CEQA significance threshold of 10 in one million for cancer risk<sup>3</sup>.

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 risk

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<sup>1</sup> 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>.

<sup>2</sup> Draft EIR. Section 5.10, *Transportation*. Table 5.10-C- Trip Generation Rates

<sup>3</sup> Draft EIR. Section 5.2, *Air Quality*. Page 5.2-38.

impacts. 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 the 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  
RVC170614-07  
Control Number

## ATTACHMENT

### Daily Truck Trip Rate

1. In the air quality analysis, the Lead Agency used the Institute of Transportation Engineers Trip Generation Manual, 9<sup>th</sup> Edition, 2012 (ITE Manual) 1.68 overall trip generation rate (for cars and trucks totaling approximately 1,472 daily vehicles) , and did not use the 0.64 (38.1%) daily truck trip rate from this same reference. Rather, the Trip Generation Rates used a passenger vehicle trip rate of 1.337 vehicles per day and a daily truck trip rate of 0.343 daily truck trip rate (1.68 total daily trip rate minus 1.337 passenger vehicle trip rate or 20.43% daily truck trip rate). Additionally, truck vehicle fleet mixture percentages from the City of Fontana Truck Trip Generation Study (Fontana Study) was used to estimate project air quality operational impacts in the CalEEMod modeling. By using the 0.343 daily truck trip rate, trucks are estimated at 230 daily truck trips in the Draft EIR instead of approximately 427 daily truck trips using the ITE 0.64 daily truck trip rate. Therefore, absent from a specific traffic study of known tenants, the Final EIR should be consistent using the associated ITE truck trip rate to estimate daily truck trips so that the Proposed Project's truck trips and associated emissions and health impacts are not underestimated.
2. The total vehicle mixture in Appendix B.1 – CalEEMod Output Files was not consistent with the traffic analysis<sup>4</sup>. Appendix B.1 – CalEEMod Output Files – Section 4.3 Trip Type Information, heavy duty trucks accounted for 31.2% of the total trips while the traffic study appropriated 20.43% of total trips to heavy duty trucks. SCAQMD staff recommends using the ITE truck trip rate of 0.64 trips/tsf (38.1% of total vehicle trips) to estimate daily truck trips so that the Proposed Project's truck trips, emissions, and health impacts are not underestimated.
3. Additionally, the heavy duty fleet mixture in Appendix B.1 was not consistent with the heavy duty truck fleet mixture in the traffic study and the HRA<sup>5</sup>, which may have underestimated the Proposed Project's operational emissions. Appendix B.1 included a heavy duty truck fleet mixture of LHD = 20.8%, MHD = 27.8%, HHD = 51.4%, while the traffic study and HRA used a heavy duty truck fleet mixture of LHD = 17%, MHD = 23%, HHD = 60%. Therefore, SCAQMD staff recommends that the Lead Agency correct the inconsistencies and use the ITE 0.64 daily truck trip rate and a heavy truck fleet mixture of LHD2 = 0.0645, MHD = 0.0865, HHD = 0.2300 consistently throughout the Final EIR and technical appendices.

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

4. 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 NOx 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 website<sup>6</sup>.

**MM AQ 3: 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**

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<sup>4</sup> *Ibid.*

<sup>5</sup> Draft EIR. Modeling Files – “EmissionFactors\_4-26-17.xlsx.”

<sup>6</sup> South Coast Air Quality Management District. <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.

2007 model year NOx emissions requirements<sup>7</sup>, at a minimum. Additionally, consider other measures such as incentives, phase-in schedules for clean trucks, etc.

**MM AQ 4:** Limit truck trips to 230 diesel truck trips per day that is analyzed in the Final EIR. If higher daily truck trips are anticipated during operation, the Lead Agency should commit to re-evaluating the Proposed Project through CEQA prior to approving an occupancy permit.

**MM AQ 5:** Provide electric vehicle (EV) charging stations (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 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 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy<sup>8</sup>. 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 stations<sup>9</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>7</sup> 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).

<sup>8</sup> Southern California Association of Governments. Adopted April 7, 2016. Available at: <http://scagtrpocs.net/Pages/default.aspx>.

<sup>9</sup> City of Los Angeles. March 30, 2017. Accessed at: [http://ladbs.org/LADBSWeb/LADBS\\_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf](http://ladbs.org/LADBSWeb/LADBS_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf).