



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 Knox Business Park Buildings D and E (“Proposed Project”) (SCH: 2015081081)

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.

Project Description

The Lead Agency proposes the construction and operation of two high-cube warehouses totaling 1,113,627 square feet (sf) on 58.6 acres (“proposed project”). Based on a review of aerial photographs, SCAQMD staff found that the areas immediately north, east, and west of the proposed project are vacant, while there are single-family homes scattered within 500 feet south of the proposed project. Construction is expected to occur in one phase over 23 months starting in 2018².

Air Quality and Health Risk Assessment (HRA) Analyses

In the Air Quality Section, the Lead Agency quantified the proposed project’s construction and operation emissions and compared them to SCAQMD’s regional and localized air quality CEQA significance thresholds. The air quality analysis was based on approximately 2,115 total vehicle trips, including 806 daily diesel truck trips³. The Lead Agency found that regional operational NOx emissions are significant and unavoidable. Additionally, the Lead Agency performed a HRA and found that the Maximum Exposed Individual Resident cancer risk would be 5.97 in one million which is below SCAQMD’s CEQA significance threshold of 10 in one million for cancer risk⁴.

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 Draft EIR. Section 3.0, *Project Description*. Page 3-33.

³ Draft EIR. Section 4.15, *Transportation*. Table 4.15-14: Project Trip Generation (Based on ITE 9th Edition and 1,259,050 SF “2016 Study”).

⁴ Draft EIR. Appendix B1, *Air Quality Impact Analysis*. Table 3: Summary of Cancer Risks.

SCAQMD staff has concerns about the air quality and HRA analyses in the Draft EIR. First, the analyses were based on inconsistent truck trip rates. Second, the HRA analysis used assumptions which have likely led to an under-estimation of the proposed project's health risk impacts. Details are included in the attachment. Additionally, as described in the 2016 AQMP, 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

LS:JC

RVC170524-04

Control Number

ATTACHMENT

Air Quality and Health Risk Assessment (HRA) Analyses

1. Based on a review the Air Quality Section of the Draft EIR, Appendix B1 – Air Quality Impact Analysis, and Appendix B2 – Mobile Source Health Risk Assessment, SCAQMD staff found that the truck trip rates were inconsistent. SCAQMD staff recommends that the Lead Agency address the inconsistency in the Final EIR and technical appendices, and update the air quality emission estimates and health risk calculations.
2. In the HRA, the Lead Agency averaged the DPM emissions for the 70-years of exposure and used that emission rate to estimate health risks. 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 have 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 and technologies, it would not be appropriate to average out the emissions over the 70-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).
3. On March 6, 2015, OEHHA adopted the revised Guidance for performing a HRA⁶. The Lead Agency prepared and publicly circulated a Notice of Preparation for the proposed project on August 31, 2015⁷. Based on a review of the Appendix B2 – Mobile Source Health Risk Assessment⁸, SCAQMD staff found that the Lead Agency performed a HRA for the proposed project on October 6, 2015. The 2015 revised OEHHA Guidance is the most recent version and was available at the time of analysis. Therefore, SCAQMD staff recommends that the Lead Agency use the 2015 revised OEHHA Guidance to revise the HRA analysis.

Siting Warehouses Near Residences

4. Based on a review of aerial photographs, SCAQMD staff found that the nearest sensitive receptor is approximately 500 feet south of the proposed project. While SCAQMD staff recognizes that there are many factors Lead Agencies must consider when making local planning and land use decisions, there are concerns about the proximity of a warehouse to the existing residences and the potential long-term air quality impacts to the people living near the warehouse and along the truck routes as a result of increased truck activities. SCAQMD staff recommends that the Lead Agency use the California Air Resources Board's (CARB) Air Quality and Land Use Handbook as a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land-use decision making process. In the CARB's Air Quality and Land Use Handbook, CARB recommends a buffer of at least 1,000 feet between distribution centers that accommodate more than 100 trucks per day and a buffer of 500 feet from high-traffic urban roadways⁹.

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/crn/notice-adoption-air-toxics-hot-spots-program-guidance-manual-preparation-health-risk-0>.

⁶ *Ibid.*

⁷ Draft EIR. Section 1.0, *Introduction*. Page 1-9. SCAQMD Control Number: RVC150707-04.

⁸ Draft EIR. Appendix B2, *Mobile Source Health Risk Assessment*. Reference 14 on Page 17.

⁹ CARB's Air Quality and Land Use Handbook is available at: <http://www.arb.ca.gov/ch/handbook.pdf>. Guidance is for siting new sensitive land uses within 1,000 feet of a distribution center (Page 4). The buffer is a neutral mitigation measure provided to minimize truck activity emission impacts to sensitive receptors. Besides truck activity of more than 100 trucks per day, this

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

5. CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant impacts. In the event that the Lead Agency, after revising the HRA analysis based on the comments provided above, finds that the proposed project would result in significant health risk impacts, SCAQMD staff recommends incorporating the following mitigation measures in the Final EIR in addition to mitigation measure (MM) 4.3-1 through MM 4.3-10¹⁰. The recommended mitigation measures are also capable of further reducing the significant NOx emissions during operation. For more information on potential mitigation measures as guidance to the Lead Agency, please visit SCAQMD's CEQA Air Quality Handbook website¹¹.
- a. **MM 4.3-11 (Applies to the Building D Site and the Building E Site): All on-site cargo handling equipment (CHE), including yard trucks, hostlers, yard goats, pallet jacks, forklifts, and other on-site equipment shall be powered by electricity.**
 - b. **MM 4.3-12 (Applies to the Building D Site and the Building E Site): All Heavy-Heavy Duty (HHD) vehicles shall conform to 2010 EPA truck standards or better. Users shall maintain compliance through normal course of business and document compliance on an annual basis to the Lead Agency. Trucks incapable of conforming to 2010 EPA truck standards or utilizing the electrical hookup for powering refrigeration shall be prohibited from accessing the site.**
 - c. **MM 4.3-13 (Applies to the Building D Site and the Building E Site): Provide electric vehicle (EV) Charging Stations for trucks and cars. Please 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. Further, trucks that run at least partially on electricity are projected to become available during the life of the proposed project as discussed in the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy¹². 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 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, SCAQMD staff recommends that the Lead Agency require at least 5% of all vehicle parking spaces (including for trucks) include EV charging stations¹³. 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.

guidance applies to distribution centers that accommodate more than 40 transport refrigeration units per day or where TRU operations will exceed 300 hours per week truck activities and sensitive receptors (Page 4).

¹⁰ Draft EIR, Section S.0, *Executive Summary*. Pages S-17 to 20.

¹¹ South Coast Air Quality Management District. <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.

¹² Southern California Association of Governments. April 7, 2016. Available at: <http://scagrtpsc.net/Pages/default.aspx>.

¹³ City of Los Angeles. March 30, 2017. Available at:

http://ladbs.org/LADBSWeb/LADBS_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf.