



# 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 Pacific Freeway Center**

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.

### Project Description

The Lead Agency proposes to demolish the existing structure and construct two high-cube warehouses totaling 522,000 square feet (sf) on 26.62 acres (Proposed Project). The Proposed Project is surrounded by industrial uses on all sides.

### 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 972 total vehicle trips, including 371 daily diesel truck trips<sup>1</sup>. The Lead Agency found that the Proposed Project's regional operational NOx emissions were significant and unavoidable after incorporating mitigation measures (MM) AQ-1 through MM AQ-13. Additionally, the Lead Agency performed a HRA and found that the Maximum Exposed Individual Resident cancer risk would be 0.06 in one million which is below SCAQMD's CEQA significance threshold of 10 in one million for cancer risk<sup>2</sup>.

### 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)<sup>3</sup>, which was later approved by the California Air Resources Board on March 23, 2017. Built upon the progress in implementing the 2007 and 2012 AQMPs, the 2016 AQMP provides a regional perspective on air quality and the challenges facing the South Coast Air Basin. The most significant air quality challenge in the Basin is to achieve an additional 45 percent reduction in nitrogen oxide (NOx) emissions in 2023 and an additional 55 percent NOx reduction beyond 2031 levels for ozone attainment.

SCAQMD staff has concerns about the air quality and HRA analyses in the Draft EIR. 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, the Proposed Project plays a role in contributing to Basin-wide NOx emissions. As described above, achieving NOx emission reductions in a timely manner is critical to attaining the National Ambient Air Quality Standard (NAAQS) for ozone

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<sup>1</sup> Draft EIR. Table 4.7-15 – Project Trip Generation Summary.

<sup>2</sup> Draft EIR. Section 4.1, *Air Quality*. Page 4.1-46.

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

before the 2023 and 2031 deadlines. SCAQMD is committed to attaining the ozone NAAQS as expeditiously as practicable. To further reduce NOx emissions during operation, the attachment includes an additional mitigation measure to use 2010 and newer haul trucks which the Lead Agency should include in the Final EIR.

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  
SBC171005-05  
Control Number

## ATTACHMENT

### **Air Quality and Health Risk Assessment (HRA) Analyses**

1. On March 6, 2015, the Office of Environmental Health Hazard Assessment (OEHHA) adopted the revised Guidance for performing a HRA<sup>4</sup>. The Lead Agency prepared and publicly circulated a Notice of Preparation for the Proposed Project on April 7, 2017<sup>5</sup>. Based on a review of the Appendix B – AQ Impact Analysis, GHG Impact Analysis, and Health Risk Assessment, SCAQMD staff found that the Lead Agency performed a HRA for the Proposed Project on August 18, 2017. The 2015 revised OEHHA Guidance is available at the time of the HRA analysis. SCAQMD staff recommends that the Lead Agency use the 2015 revised OEHHA Guidance to revise the HRA analysis<sup>6</sup>.
2. In the HRA, the Lead Agency averaged the DPM emissions for the 70-year of exposure and used that emission rate to estimate health risks. The most recent 2015 revised OEHHA Guidance 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. The HRA analysis involved the use of separate discrete receptors placed randomly. SCAQMD staff recommends that the Lead Agency revise the HRA and use a receptor grid of no more than 100-meter spacing over the surrounding area in order to ensure that the maximum potential health impacts are properly analyzed and disclosed in the Final EIR.
4. Receptor locations should be placed at the boundaries of the residential property and not the residential structure since residents have the potential to spend time outdoors (recreation, dining, etc.). Placing receptors on the residential structure will likely underestimate cancer risks to the residents since people go outside the residential structure for recreational activities. Therefore, 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.

### **Additional Mitigation Measure 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. 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 measure in the Final

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<sup>4</sup> 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>.

<sup>5</sup> Draft EIR. Section 2.5.1 – NOP Scoping Process.

<sup>6</sup> When SCAQMD acts as the Lead Agency, SCAQMD staff uses the 2015 revised OEHHA Guidance to conduct the HRA analysis.

EIR. For more information on potential mitigation measures as guidance to the Lead Agency, please visit SCAQMD's CEQA Air Quality Handbook website<sup>7</sup>.

- a. MM AQ-14: 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 NOx emissions requirements<sup>1</sup>, at a minimum. Additionally, consider other measures such as incentives, phase-in schedules for clean trucks, etc."

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<sup>7</sup> South Coast Air Quality Management District. <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.