



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 Space Center Industrial Project (SCH No.: 2015051053)

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

Adopted on March 3, 2017, the 2016 Air Quality Management Plan (2016 AQMP) is a regional blueprint for achieving air quality standards and healthful air in the South Coast Air 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 South Coast Air Basin. The most significant air quality challenge in the Basin is to achieve an additional 45 percent reduction in nitrogen oxide (NO_x) emissions in 2023 and an additional 55 percent NO_x reduction beyond 2031 levels for ozone attainment. For more information on the 2016 AQMP, please visit the SCAQMD's website, at: <http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan>.

Project Description

The Lead Agency proposes the construction and operation of two high-cube warehouses with refrigeration and electric locomotive rail capabilities¹ totaling 1,124,015 square feet (sf) on an approximately 51.3-acre site ("project"). The areas immediately north, west and south of the project site are designated for Light Industrial uses. Medium Density Residential designated areas are located approximately 100 feet east of the project across Etiwanda Avenue. The project site is also bordered by Union Pacific Railroad and U.S. Route 60 and would be connected to the Union Pacific Railroad across the drainage channel. Approximately 720 daily diesel truck trips and 1,890 total daily vehicle trips would be expected during project operation. The Lead Agency also proposes three Truck Access Options to help reduce project truck trips, emissions, and noise impacts on residents currently living east of the project site. The Options are: (1) the Proposed Project Truck Access, (2) Restricted Truck Access, and (3) Etiwanda Avenue/SR-60 Off-Ramp Truck Access.

Air Quality and Health Risk Assessment (HRA) Analyses

In the Air Quality Section, the Lead Agency quantified the project's construction and operation air quality impacts and compared the emissions to the SCAQMD's CEQA regional and localized daily significance thresholds. The Lead Agency found that operational air quality impacts would exceed the SCAQMD's CEQA regional daily significance thresholds for VOC and NO_x. Additionally, the Lead Agency conducted an HRA to determine the project's long-term health risks from trucks and trains during operation under each Truck Access Option and found the following:

¹ See: Space Center Industrial Project – Draft Environmental Report – Pages 4.3-23, 28, and 4.7-19

- Option 1 – Proposed Project Truck Access: 7.62 in one million
- Option 2 – Restricted Truck Access: 4.73 in one million
- Option 3 – Etiwanda Avenue/SR-60 Off-Ramp Truck Access: 4.77 in one million

As shown above, the cancer risk for each Truck Access Option would be less than the SCAQMD's CEQA significance threshold of 10 in one million. However, after a review of the Draft EIR's air quality analysis, HRA, and supporting technical documents, SCAQMD staff found that the analyses for the electric locomotive rail capabilities were difficult to follow, and that it was not clear how electric locomotives would be enforced during project operation. EIR is an informational document. Technical perfection is not required, but rather adequacy, completeness, and a good-faith effort at full disclosure (CEQA Guidelines Section 15003 (i)). The Final EIR should provide the information to facilitate public disclosure. Please see the attachment for more information.

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 certification 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 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

JW:LS:JC

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Control Number

ATTACHMENT

Air Quality Analysis

1. As stated on pages 4.3-23, 28, and 4.7-19 of the Draft EIR, the project would include the operation of two high-cube warehouses with rail capabilities. However, based on a review of “Appendix D-1_Air Quality Report w_Ap 6-10-16.pdf” and “Appendix 3.2 – CalEEMod Emissions Model Output,” the SCAQMD staff found that regional air emissions from the rail capabilities during operation were not calculated. Although the Draft EIR stated that only electric locomotives would be allowed to access the project site, based on a review of Section 2.3.3 of the Draft EIR and the modeling performed for the project, the SCAQMD staff found that Tier IV locomotive engines were used to calculate the emissions. “[...] The EIR serves as a public disclosure document explaining the effects of the proposed project on the environment, alternatives to the project, and ways to minimize adverse effects and to increase beneficial effects [...]” (CEQA Guidelines Section 15149(b)). To facilitate a good-faith effort at public disclosure, the SCAQMD staff recommends providing additional information in the Final EIR to clarify the inconsistency in the Draft EIR analysis between excluding rail emission calculations and the modeling of Tier IV locomotive engine emissions.
2. To ensure that the use of electric locomotives are enforceable during project operation, the SCAQMD staff recommends incorporating this as an additional project design feature. Please see Comment No. 8(b) below. In the event that the commitment for electric locomotives is not enforceable, the SCAQMD staff recommends that the Lead Agency revise all the air quality analyses and HRA with the use of diesel-fueled locomotives and include these impacts in the Final EIR and supporting technical appendices.
3. As stated in the project description, the Lead Agency proposes to connect the project site to the Union Pacific Railroad across the drainage channel. However, based on a review of the air quality analysis and supporting technical documentation, the SCAQMD staff found that construction emissions for the railroad connection was not included in the emission calculations. The SCAQMD staff recommends calculating the emissions from the construction of the railroad connection and including them in the Final EIR.

Siting Warehouses near Residences

4. Based on the information in the project description, the nearest sensitive receptor is approximately 100 feet east of the project across Etiwanda Avenue. While the 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. The 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 roadways².

² 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 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).

5. Additionally, based on a review of an aerial map, the SCAQMD staff estimated the distance from the project site to the nearest sensitive receptor under each Truck Access Option as follows:
- Option 1 – Proposed Project Truck Access would likely provide an approximate 20-foot buffer
 - Option 2 – Restricted Truck Access would likely provide an approximate 837-foot buffer
 - Option 3 – Etiwanda Avenue/SR-60 Off-Ramp Truck Access would likely provide an approximate 258-foot buffer

As such, truck access under Option 2 would provide the existing residences with the maximum protection from exposure to truck emissions that the Lead Agency should consider when deciding on the option to implement.

Health Risk Assessment (HRA) Analysis

6. In the HRA, the Lead Agency used the AERMOD dispersion model to estimate diesel particulate matter (DPM) concentrations from the diesel vehicles and used the 2015 revised OEHHA guidelines to estimate the health risks to residents, workers, and schools in the project vicinity. The Lead Agency found that the project under Option 1 – Proposed Project Truck Access would result in a cancer risk of 7.62 in one million (see Page 2 above). The SCAQMD staff has concerns about the modeling parameters and recommends that the Lead Agency revise the HRA based on the following comments:
- a. 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 health risks 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, 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 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).
- b. Based on a review of the file “2015 OEHHA – Project Truck Route – Residential HRA,” the SCAQMD staff found that the HRA model runs included 287 Discrete Cartesian receptors. However, the *.PLT and *.ROU files indicated that only 24 out of 287 receptor locations were processed. Since the project includes mixed sources (point and volume) and building downwash, the SCAQMD staff recommends that the Lead Agency revise the HRA modeling to disclose potential health risks at all 287 receptor locations to ensure that potential peak concentrations are not missed.

Recommended Changes to Existing Project Design Features (PDFs) & Mitigation Measures

7. CEQA requires that all feasible mitigation measures and project design features that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate significant impacts. To be consistent with the air quality analysis in the Draft EIR and to further reduce the significant VOC and NO_x emissions, the SCAQMD staff recommends that the Lead Agency include the following changes to the PDF 3-2 and Mitigation Measure 4.3.6.2F in the Final EIR.

a. **PDF 3-2³:**

As part of the project's design, all on-site indoor and outdoor cargo handling equipment (CHE), including yard trucks, hostlers, yard goats, pallet jacks, forklifts, and other on-site equipment, ~~will be powered by diesel fueled engines that comply with the California Air Resources Board (CARB)/U.S. EPA Tier IV Engine standards for off road vehicles or better (defined as less than or equal to 0.015 g/bhp hr for PM10) and all on site indoor forklifts shall be powered by electricity.~~

b. **Mitigation Measure 4.3.6.2F: Bullet Point – 1**

~~Encourage all fleet~~ **All Heavy-Heavy Duty (HHD) vehicles shall** ~~to conform to 2010 EPA truck air quality standards or better. Users shall maintain compliance through normal course of business and document compliance on an annual basis to the City...Trucks incapable of conforming to 2010 EPA truck standards or utilizing the electrical hookup for powering refrigeration shall be prohibited from accessing the site.~~

Additional Recommended Mitigation Measure & PDF

8. The 2016 AQMP states that achieving NOx emissions 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, the SCAQMD staff recommends an additional mitigation measure and project design feature to further reduce air emissions, particularly from NOx emissions, to ensure that South Coast Air Basin is on track to attain the NAAQS.
- a. **Additional Mitigation Measure: Provide electric vehicle (EV) Charging Stations for trucks and cars (see the discussion below regarding EV charging stations).**

SCAQMD Staff Reasoning to Support this Recommendation: 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 Strategy⁴. 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 stations⁵. 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.

³ For more information on electric cargo handling equipment, please visit: <http://www.aqmd.gov/home/library/technology-research>; <http://www.cleanairactionplan.org/>; and <http://polb.com/environment/air/grants.asp>. The information is intended to assist the Lead Agency in the implementation of PDF 3-2.

⁴ Southern California Association of Governments. Adopted April 7, 2016. Available at: <http://scagtrpccs.net/Pages/default.aspx>.

⁵ City of Los Angeles. Accessed on March 30, 2017. Available at: http://ladbs.org/LADBSWeb/LADBS_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf.

- b. **Additional PDF:** The Lead Agency is committed to using electric locomotives to reduce air pollutant emissions. The developer and occupants agree to incorporate this commitment into a fully enforceable contract, agreement, or other legally binding instruments as a mandatory condition before the issuance of the occupancy permit by the Lead Agency. If a non-electric locomotive is anticipated or required, the Lead Agency should update the Air Quality Impact Analysis, Health Risk Assessment and Final EIR to disclose this impact to the public.

SCAQMD Staff Reasoning to Support this Recommendation: The SCAQMD staff is supportive of the Lead Agency's commitment to using electric locomotives during project operation. CEQA requires that mitigation measures and project design features be fully enforceable through permit conditions, agreements, or other legally binding instruments (Public Resources Code Section 21081.6 (b) and CEQA Guidelines Section 15126.4 (a)(2)). Establishing a program of enforceable measures and project design feature that actually will be implemented to reduce emissions for most of the project's life is particularly important at this juncture because the project may not receive any further environmental review after it is approved. As such, the SCAQMD staff's recommendation is to ensure that this commitment is enforceable, by having the project applicant enter into a legally binding agreement prior to project operation.