



# South Coast Air Quality Management District

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SENT VIA USPS AND E-MAIL:

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## **Mitigated Negative Declaration (MND) for the Proposed 9500 and 9505 Feron Boulevard Warehouse (Design Review DRC2016-00695)**

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 MND.

The Lead Agency proposes to construct and operate two, high-cube warehouses, totaling 150,003 square with unknown occupants on an approximately 7.52-acre site (“proposed project”). The MND estimates approximately 534 total vehicle trips, including approximately 105 daily diesel truck trips. In the Air Quality Section, the Lead Agency quantified the proposed project’s construction and operation air quality impacts and compared those impacts with the SCAQMD’s regional and localized air quality CEQA significance thresholds. The Lead Agency found that regional and localized construction and operational emissions would be less than significant.

### Insufficient Time for Review

The MND for the proposed project was released for public review and comments beginning on March 7 through April 12, 2017. On March 31, 2017, the SCAQMD staff requested that all air quality modeling, health risk assessment files, and original emission calculation spreadsheets be provided in electronic format. Without all files and supporting documentation, the SCAQMD staff will be unable to complete the review of the air quality analyses in a timely manner. Air dispersion models and emission rate calculations were provided to SCAQMD on the last day of the public review and comment period, which was April 12, 2017 at 12:06 p.m. SCAQMD staff was not provided sufficient time to review emission rate calculations, air dispersion modeling, or the HRA. As such, it is recommended that the Lead Agency extend the comment period to allow for additional review.

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

The SCAQMD staff has concerns about the air quality and health risk analyses in the MND. First, the modeling performed for this project was based on improper assumptions. Second, the modeling assumptions were difficult to follow and understand. These have likely led to an under-estimation of the project’s air quality and health risk impacts. Additional details are included in the attachment. After revising the air quality and HRA analyses, should the Lead Agency determine that project’s air quality and health impacts will exceed the SCAQMD recommended CEQA significance thresholds, the identification and evaluation of mitigation measures to reduce impacts below significance levels are required before the consideration of the MND for adoption pursuant to the CEQA Guideline Section 15074(b). Additionally, the SCAQMD staff has included a list of mitigation measures in the attachment to assist the Lead Agency in identifying feasible mitigation measures which have the potential to substantially lessen such significant air quality effects as stated in Public Resources Code Section 21002.

Pursuant to the CEQA Guidelines Section 15074, prior to approving the proposed project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process. Please provide the SCAQMD staff with written responses to all comments contained herein prior to the adoption of the Final MND. The SCAQMD staff is available to work with the Lead Agency to address these issues and any other air quality and HRA questions that may arise. Please contact Jack Cheng, Air Quality Specialist – CEQA IGR Section, at (909) 396-2448, if you have any questions regarding these comments.

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment

LS:JC

SBC170310-03

Control Number

## ATTACHMENT

### **Vehicle Fleet Mixture Percentages**

1. In the MND, the Lead Agency used the City of Fontana Truck Trip Generation Study (Fontana Study) to estimate project's operational air quality impacts and related analysis to determine the number and types of project truck trips. The Fontana Study fleet mixture percentages are: 3.46 percent of the total fleet for 2-axle Trucks; 4.64 percent for 3-axle trucks; and 12.33 percent for 4-axle and larger trucks with truck categories, totaling 20.43 percent of the total vehicle fleet. Passenger vehicles would therefore comprise 79.57 percent of total vehicles during operations. The SCAQMD staff recommends that the Lead Agency adjust the CalEEMod fleet mixture truck subcategories.

### **Siting Warehouses near Residences**

2. 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. In the event that the proposed project is in the proximity of the existing residences, 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 land uses that will have 100 or more trucks per day.<sup>1</sup>

### **Health Risk Assessment (HRA) Analysis**

3. Based on a review of the "Attach G Cancer Risk Calcs via inhalation mitigated.pdf," the SCAQMD staff found that health impacts from project operation were not evaluated or included in the MND. To ensure that the potential health risks from all phases of the proposed project are adequately evaluated and disclosed, the SCAQMD staff recommends that the Lead Agency conduct an operational mobile source HRA<sup>2</sup> and disclose the potential health risks in the Final MND.
4. The Lead Agency used 54 point sources to represent project emission sources. It is unclear what the sources represent. The SCAQMD staff recommends the Lead Agency revise the model and health risks to include idling of 15 minutes. The 15 minutes of idling includes the emissions generated when entering the project site while heading towards the dock area; idling at the dock; and the emissions generated when leaving the dock site while departing from the facility. Guidance for performing a mobile source health risk assessment is available on the SCAQMD website<sup>3</sup>.
5. The Lead Agency used 570 discrete cartesian points to represent receptor locations. The SCAQMD staff recommends the Lead Agency revise the model using a 30-meter receptor grid. Modeling guidance can be found on the SCAQMD website available at: <http://www.aqmd.gov/home/library/air-quality-data-studies/meteorological-data/modeling-guidance>.

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<sup>1</sup> CARB Air Quality and Land Use Handbook: <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 1,000 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).

<sup>2</sup> South Coast Air Quality Management District. *Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*. Available at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>

<sup>3</sup> *Ibid.*

6. The Lead Agency estimated idling emissions using the EPA MOVES Model. The EPA MOVES Model is a national mobile source emissions model. The SCAQMD staff recommends that the Lead Agency use the EMFAC2014 Database (<https://www.arb.ca.gov/emfac/>) which was approved by the U.S. EPA for use in the State of California effective December 14, 2015<sup>4</sup>.
7. 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, and to avoid underestimating the health risks to children who would be exposed to higher DPM concentrations during the early years of project operation, 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).
8. The Lead Agency used AERMOD PRIME (version 15181) to conduct an HRA. AERMOD PRIME is downwash algorithm within the AERMOD model used for determining building downwash effects. When revising the HRA analysis based on the above-mentioned comments, the SCAQMD staff recommends that the Lead Agency use the most recent version of AERMOD (version 16216r<sup>5</sup>).

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

9. 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. In the event that the Lead Agency, after revising the air quality analyses based on the comments provided above, finds that the proposed project would result in significant air quality impacts, the SCAQMD staff recommends incorporating the following on-road mobile-source truck related mitigation measures in the Final MND. Additional information on potential mitigation measures as guidance to the Lead Agency are available on the SCAQMD CEQA Air Quality Handbook website.<sup>6</sup>
  - 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. In the event that that 2010 model year or newer diesel trucks cannot be obtained, provide documentation as information becomes available and use trucks that meet EPA 2007 model year NO<sub>x</sub> emissions requirements<sup>7</sup>. Additionally, consider other measures such as incentives, phase-in schedules for clean trucks, etc.
  - Have truck routes clearly marked with trailblazer signs, so that trucks will not enter residential areas.
  - Limit activities to the amounts analyzed in the MND.

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<sup>4</sup> California Air Resources Board. Accessed on April 12, 2017. *Mobile Source Emission Inventory – Categories*. Available at: <https://www.arb.ca.gov/msei/categories.htm>.

<sup>5</sup> U.S. EPA. January 17, 2017. Available at: <https://www.epa.gov/scram/air-quality-dispersion-modeling-preferred-and-recommended-models>.

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

<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/000000003422/California-Clean-Truck-and-Trailer-Update.pdf> (See slide #23).

- Promote clean truck incentive programs (see the discussion above regarding Cleaner Operating Truck Incentive Programs), and
- Provide electric vehicle (EV) Charging Stations (see the discussion below regarding EV charging stations).
- 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 MND, 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.
- 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, 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>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.

#### **Additional Mitigation Measures for Operational Air Quality Impacts (Other Area Sources)**

10. In the event that the Lead Agency, after revising the air quality analyses based on the comments provided above, finds that the project's operational air quality impacts would be significant, the Lead Agency should incorporate the following onsite area source mitigation measures below, in addition to the mobile source mitigation measures identified above.
- Maximize use of solar energy including solar panels; installing the maximum possible number of solar energy arrays on the building roofs and/or on the Project site to generate solar energy for the facility.
  - Maximize the planting of trees in landscaping and parking lots.
  - Use light colored paving and roofing materials.
  - Utilize only Energy Star heating, cooling, and lighting devices, and appliances.
  - Install light colored "cool" roofs and cool pavements.
  - Limit the use of outdoor lighting to only that needed for safety and security purposes.
  - Require use of electric or alternatively fueled sweepers with HEPA filters.
  - Use of water-based or low VOC cleaning products.

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

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