



# 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 AL2 Carson 420K Industrial Building**

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.

### Project Description

The Lead Agency proposes to construct and operate a 405,800-square-foot, high-cube warehouse with unknown occupants on an approximately 19.85-acre site (“proposed project”). The proposed project is bounded by commercial uses to the north, east, and south. Based on a review of aerial photographs, SCAQMD staff found that residential dwellings are within 80 feet to the west of the proposed project.

### 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 706 total vehicle trips, including 269 daily diesel truck trips<sup>1</sup>. The Lead Agency found that regional and localized construction and operational emissions would be less than significant. Additionally, the Lead Agency performed a HRA and found that the Maximum Exposed Individual Resident cancer risk would be 9.24 in one million which is below SCAQMD’s CEQA significance threshold of 10 in one million for cancer risk<sup>2</sup>.

SCAQMD staff has concerns about the HRA analysis in the MND. The analysis utilized assumptions which have likely led to an under-estimation of the proposed project’s health risk impacts. Details are included in the attachment. After revising the HRA analysis, should the Lead Agency find that the proposed project’s health impacts would exceed SCAQMD’s CEQA significance thresholds, mitigation measures are required pursuant to the CEQA Guideline Section 15074(b). 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 effects (Public Resources Code Section 21002).

Pursuant to the CEQA Guidelines Section 15074, prior to approving the project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process. Please provide SCAQMD staff with written responses to all comments contained herein prior to the adoption of the Final MND.

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<sup>1</sup> Appendix G – Traffic Impact Analysis – Table 4.2 Project Trip Generation Summary.

<sup>2</sup> Appendix B – Health Risk Assessment – 6.2 Cancer Risk and Cancer Burden.

SCAQMD staff is available to work with the Lead Agency to address the issues raised in the letter 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

JW:LS:JC

LAC170525-07

Control Number

## ATTACHMENT

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

1. Based on a review of the HRA analysis, SCAQMD found that the HRA analysis utilized the 2015 revised OEHHA guidelines to estimate the health risks to sensitive receptors in the proposed project's vicinity and that the AERMOD dispersion model was used to estimate diesel particulate matter (DPM) concentrations. SCAQMD staff recommends that the Lead Agency revise the HRA analysis based on the following comments.
  - a. Dock loading idling emissions were modeled as individual point sources at two idling locations along the planned loading docks (DOCK1 – 2). SCAQMD staff recommends that the Lead Agency use a series of volume sources to account for the on-site truck travel DPM emissions.
  - b. Only Five minutes of idling were included. SCAQMD staff recommends that the Lead Agency include 15 minutes of idling. The 15-minute idling includes the emissions generated when entering the proposed project site while heading towards the dock area; idling at the dock; and the emissions generated when leaving the docks while departing from the proposed project.
  - c. SCAQMD staff found that emissions from Light Heavy Duty (LHD) truck trips were not included in the "Truck2" emission factor for the HRA dispersion modeling. The Project Trip Generation Summary<sup>3</sup> estimated that 60% of truck trips would be from HHD, 18% from MHD, and 22% from LHD. By excluding the emissions from the 22% of LHD truck trips, the HRA has underestimated the DPM emissions and health risks from the proposed project. SCAQMD staff recommends that the Lead Agency include the emissions from LHD trucks in the HRA.
  - d. It was unclear if Truck2 emissions were generated as an average or weighted average<sup>4</sup>. By using an averaged emission rate, the Lead Agency may have underestimated HHD truck emissions and related health risks. SCAQMD staff recommends using a weighted average emission rate consistent with the Project Trip Generation Summary.
  - e. The HRA analysis involved the use of a 50-meter spacing receptor grid and discrete receptors placed over existing residential structures. Receptor locations should be placed at the boundaries of the residential property and not the residential structures. Placing receptors on the residential structure underestimates cancer risks to the residents. SCAQMD staff recommends that the Lead Agency revise the HRA and start the grid at the property boundaries to ensure potential maximum concentrations are identified.
  - f. In the air dispersion modeling, the Lead Agency used the non-default option "FASTALL." SCAQMD staff recommends using the default regulatory options or providing justification for using the non-default FASTALL option.
  - g. In the air dispersion modeling – Terrain Height Options, the Lead Agency used the non-default regulatory option "Flat." SCAQMD staff recommends using the default regulatory "Elevated" option or providing justification for using the non-default Flat option. The use of

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<sup>3</sup> Appendix G – Traffic Impact Analysis – Table 4.2 Project Trip Generation Summary.

<sup>4</sup> File Name 160618\_13509\_EMFAC\_1\_CRB.csv.

National Elevation Dataset (NED) 1 arc-second or DEM 7.5 minute terrain data is recommended if using the “Elevated” setting.

### **Siting Warehouses near Residences**

2. Based on the project description, the nearest sensitive receptors are within 80 feet to the west 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 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>5</sup>.

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

3. 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 on-road mobile-source truck related mitigation measures in the Final MND. 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>.
  - 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>7</sup>, at a minimum. 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 Final MND.
  - Promote clean truck incentive programs (see the discussion above regarding Cleaner Operating Truck Incentive Programs).
  - 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

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<sup>5</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. Additionally, in April 2017, ARB published a technical advisory, *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways: Technical Advisory*, to supplement ARB’s Air Quality and Land Use Handbook: A Community Health Perspective. This Technical Advisory is intended to provide information on strategies to reduce exposures to traffic emissions near high-volume roadways to assist land use planning and decision-making in order to protect public health and promote equity and environmental justice. Available at: <https://www.arb.ca.gov/ch/landuse.htm>

<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/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://scagrtpsc.net/Pages/default.aspx>.

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>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).