



# South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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**Mitigated Negative Declaration (ND) for the Proposed  
Riverside Avenue Warehouse Project  
(Environmental Assessment Review No. 2017-0082 & Precise Plan of Design No. 2017-0100)**

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 ND.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to develop an 86,447-square-foot warehouse on 5.08 acres (Proposed Project). Based on a review of the Project Location Map in the Public Notice of Intent to Issue a Negative Declaration for the Proposed Project, SCAQMD staff found that the Proposed Project is surrounded by industrial uses. Construction is expected to take approximately 12-24 months<sup>1</sup>.

SCAQMD Staff's Summary of Air Quality Analysis

In the Air Quality Analysis Section, the Lead Agency quantified the Proposed Project's construction and operation emissions and compared them to SCAQMD's regional air quality CEQA significance thresholds. The Lead Agency found that the Proposed Project's air quality impacts from construction and operational activities would be less than significant.

SCAQMD Staff's Comments

After reviewing the Air Quality Analysis in Exhibit C, it did not appear that all of the air quality questions in the CEQA Guidelines Appendix G were analyzed in the ND. The Air Quality Analysis in Exhibit C included the analysis on the Proposed Project's potential to conflict with or obstruct implementation of the AQMP, and the short-term and long-term air quality impacts (CEQA Guidelines, Appendix G, for Air Quality – Questions III a) and b)). However, no analysis was included in the ND to answer CEQA Guidelines, Appendix G, for Air Quality – Questions III c) through e). For example, the Lead Agency did not quantify the Proposed Project's localized emissions, analyze the Proposed Project's cumulative impacts, identify if there are any sensitive receptors who will be exposed to substantial pollutant concentrations from the construction and operation of the Proposed Project, or analyze if the Proposed Project would create objectionable odors affecting a substantial number of people.

SCAQMD staff recommends that the Lead Agency provide additional analysis in the Final ND that is requisite to support a conclusion that the Proposed Project's air quality impacts would be less than significant. One of the basic purposes of CEQA is to inform government decision makers and the public about the potential, significant environmental effects of proposed activities (CEQA Guidelines Section

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<sup>1</sup> Based on a review of Exhibit C, construction is expected to take place in 2018 and 2019. However, the ND did not specify the construction schedule anticipated for the Proposed Project. Additionally, no CalEEMod worksheet was included as part of the ND for public review and comments. As such, SCAQMD staff estimated the construction schedule.

15002(a)(1)). A negative declaration is appropriate when the Lead Agency finds that the project will not have a significant effect on the environment (CEQA Guidelines Sections 15070 to 15075). Reasons to support this finding shall be documented in the initial study. Without a complete air quality analysis for all of the CEQA Guidelines Appendix G checklist questions, the ND has not made that documentation which serves as substantial evidence to support a fair argument that the Proposed Project would not have any adverse effects on air quality. Please see the attachment for detailed comments.

Conclusion

Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the ND for adoption together with any comments received during the public review process. Please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final ND. When responding to issues raised in the comments, response should provide sufficient details giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful or useful to decision makers and to the public who are interested in the Proposed Project.

SCAQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact me at [lsun@aqmd.gov](mailto:lsun@aqmd.gov) if you have any questions.

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment  
LS  
SBC180503-07  
Control Number

## ATTACHMENT

### Localized Air Quality Analysis during Construction

1. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). As stated above, the Lead Agency did not quantify the Proposed Project's localized construction emissions in the ND. Therefore, SCAQMD staff recommends that the Lead Agency quantify the Proposed Project's localized construction emissions and disclose the localized air quality impacts in the Final ND. SCAQMD guidance for performing a localized air quality analysis is available on SCAQMD website<sup>2</sup>.

### Health Risk Assessment

2. Since the Proposed Project is a warehouse project that is capable of generating and attracting vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("*Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*") can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

### SCAQMD Air Quality CEQA Significance Thresholds for Operation

3. The Lead Agency quantified the Proposed Project's long-term operational air quality impacts and compared the operational emissions to SCAQMD air quality CEQA significance thresholds for *construction* to determine the significance level. According to the SCAQMD's recommended methodology for determining the significance level for air quality impacts, *operational emissions* should be compared to SCAQMD's air quality CEQA *operational* thresholds of significance. While revising the table in Exhibit C based on this comment is not expected to change the significance determination, SCAQMD staff recommends that the Lead Agency revise the information in the "threshold level" row in the Final ND.

### Mitigation Measures

4. In the event that the Proposed Project is found to generate significant adverse air quality impacts, after conducting additional air quality analysis based on this comment letter, SCAQMD staff recommends the Lead Agency consider the following mitigation measures for incorporation in the Final ND.
  - 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>3</sup>, at a minimum. Additionally, consider other measures such as incentives, phase-in schedules for clean trucks, etc.

<sup>2</sup> South Coast Air Quality Management District. *Localized Significance Thresholds*. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

<sup>3</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).

- Have truck routes clearly marked with trailblazer signs, so that trucks will not enter residential areas.
- Limit the daily number of trucks allowed at the Proposed Project to levels analyzed in the CEQA document. If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the Proposed Project through CEQA prior to allowing this land use or higher activity level.
- 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 CEQA document, the Lead Agency should require a phase-in schedule for these cleaner operating trucks to reduce any significant adverse air quality impacts. SCAQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency.
- 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 (2016-2040 RTP/SCS)<sup>4</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, SCAQMD staff recommends the Lead Agency require the Proposed Project 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 stations<sup>5</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.
- Design the industrial building such that entrances and exits are such that trucks are not traversing past neighbors or other sensitive receptors.
- Design the industrial building such that any check-in point for trucks is well inside the Proposed Project site to ensure that there are no trucks queuing outside of the facility.
- Design the industrial building to ensure that truck traffic within the Proposed Project site is located away from the property line(s) closest to its residential or sensitive receptor neighbors.
- Restrict overnight parking in residential areas.
- Establish overnight parking within the industrial building where trucks can rest overnight.
- Establish area(s) within the Proposed Project site for repair needs.
- Develop, adopt and enforce truck routes both in and out of city, and in and out of facilities.
- Create a buffer zone of at least 300 meters (roughly 1,000 feet), which can be office space, employee parking, greenbelt, etc. between the Proposed Project and sensitive receptors.

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<sup>4</sup> Southern California Association of Governments. Accessed at: <http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx>.

<sup>5</sup> City of Los Angeles. Accessed at: [http://ladbs.org/LADBSWeb/LADBS\\_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf](http://ladbs.org/LADBSWeb/LADBS_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf).

Additional mitigation measures for operational air quality impacts from other area sources that the Lead Agency should consider may include the following:

- 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.
- Require use of electric or alternatively fueled sweepers with HEPA filters.
- Use of water-based or low VOC cleaning products that go beyond the requirements under SCAQMD Rule 1113.

Several other resources are available to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project, including:

- Chapter 11 of SCAQMD’s CEQA Air Quality Handbook
- SCAQMD’s Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions and Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities
- SCAQMD’s Mitigation Monitoring and Reporting Plan (MMRP) for the 2016 Air Quality Management Plan (2016 AQMP) available here (starting on page 86):  
<http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf>
- CAPCOA’s *Quantifying Greenhouse Gas Mitigation Measures* available here:  
<http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

#### Other Comment

5. While the CEQA Guidelines do not prescribe the level of technical details in a ND, there are some guidance on how to handle technical details in an environmental impact report (EIR). “Writing Environmental Impact Reports in plain language” (CEQA Guidelines Section 15006(q)). “The information contained in an EIR shall include summarized technical data, maps, plot plans, diagrams, and similar relevant information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public. Placement of highly technical and specialized analysis and data in the body of an EIR should be avoided through inclusion of supporting information and analyses as appendices to the main body of the EIR. Appendices to the EIR may be prepared in volumes separate from the basic EIR document, but shall be readily available for public examination and shall be submitted to all clearinghouses which assist in public review (CEQA Guidelines Section 15147).

While the Lead Agency used the CalEEMod to quantify the Proposed Project’s construction and operational emissions, the ND did not include a complete CalEEMod worksheet or any other emission calculation spreadsheets and modeling input and output files for public review. These technical calculations and modeling details should be released with the ND for input during the 20-day comment public review and comment period beginning May 2, 2018 and ending May 21, 2018, in order to foster meaningful input from the public on the completeness and adequacy of the air quality analysis.