



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Mitigated Negative Declaration (MND) for the Proposed Greenleaf Business Center Project

South Coast Air Quality Management District (South Coast AQMD) 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.

South Coast AQMD Staff's Summary of Project Description

The Lead Agency proposes to construct a 216,000-square-foot, non-refrigerated warehouse/distribution facility with 46 dock doors on 25 acres (Proposed Project). The Proposed Project is located on the northwest corner of Los Nietos Road and Greenleaf Avenue in the City of Santa Fe Springs. Construction of the Proposed Project is anticipated to occur over 12 months and will include 20,000 haul truck trips¹ and 115 truck trips per day once operational². Upon reviews of Figure 3: *Aerial Photograph* in the MND and aerial photographs, South Coast AQMD staff found that the Proposed Project is located immediately south of St. Paul High School, and within close proximity of existing residential uses³. The Proposed Project is anticipated to be operational by 2020⁴.

South Coast AQMD Staff's Summary of the Air Quality and Health Risk Assessment Analyses

In the Air Quality Analysis Section, the Lead Agency quantified the Proposed Project's construction and operational emissions and compared those emissions to South Coast AQMD's recommended regional and localized air quality CEQA significance thresholds. Based on the analysis, the Lead Agency found that the Proposed Project's regional construction air quality impacts would be significant for NO_x at 182 pounds per day (lbs/day) when compared to South Coast AQMD's CEQA air quality significance threshold of NO_x for construction, at 100 lbs/day. With implementation of Mitigation Measure AQ-1, which requires that the project construction contractor use, at minimum, Tier 4 Final emissions standards for off-road diesel construction equipment with more than 50 horsepower when feasible, construction NO_x emissions would be reduced to less than significant at 96 lbs/day⁵. The Lead Agency also found that the Proposed Project's regional and localized operational air quality impacts would be less than significant, and no operational air quality mitigation measures were included. The Lead Agency performed a Health Risk Assessment (HRA) analysis and found that the maximum incremental cancer risks for residents, students, and school workers would be 2.5 in one million, 0.04 in one million, and 0.06 in one million, respectively, and all of which are below South Coast AQMD's CEQA significance threshold of 10 in one million for cancer risk⁶.

¹ MND. Page 52.

² *Ibid.* Page 132.

³ *Ibid.* Page 59.

⁴ *Ibid.* Page 20.

⁵ *Ibid.* Page 53.

⁶ *Ibid.* Page 59.

South Coast AQMD Staff's General Comments

South Coast AQMD staff has comments on the cancer risk calculations for the HRA analysis. Please see the attachment for more information. To further reduce exposures of sensitive receptors to the Proposed Project's construction and operational air quality impacts, the attachment includes additional mitigation measures that the Lead Agency should review and incorporate in the Final MND.

Conclusion

Pursuant to 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 South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, responses 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, informative, or useful to decision makers and the public who are interested in the Proposed Project. Further, when the Lead Agency makes the finding that the additional recommended mitigation measures are not feasible, the Lead Agency should describe the specific reasons for rejecting them in the Final MND (CEQA Guidelines Sections 15070 and 15074.1).

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Margaret Isied, Assistant Air Quality Specialist, at misied@aqmd.gov or (909) 396-2543, should you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment

LS:MI

LAC191119-03

Control Number

ATTACHMENT

Health Risk Assessment Analysis

1. The Lead Agency calculated cancer risks for residents, school children, and teachers (as off-site workers) at St. Paul High School. Upon reviews of aerial photographs, South Coast AQMD staff found additional off-site workers are located to the northwest (along Santa Fe Springs Road) and the southwest (along Los Nietos Road) of the Proposed Project. South Coast AQMD staff recommends that the Lead Agency evaluate the exposure to the maximum exposed individual workers at these off-site locations, or provide a justification for not evaluating the risk exposure to these off-site workers.
2. The Lead Agency used four years of exposure to calculate cancer risk to students at St. Paul High School, consisting of risk exposures for the 2 to 16 years age bin, and the 16 to 30 years age bin⁷. The 2015 revised Office of Environmental Health Hazard Assessment (OEHHA) guidelines acknowledge that children are more susceptible to exposures to air toxics and have revised the way cancer risks are estimated to take this into account. When calculating cancer risk to students, South Coast AQMD staff recommends that the Lead Agency start from the third trimester, calculate cancer risk for each individual age group (i.e., the third trimester to 0 year age bin, the 0 to 2 years age bin, the 2 to 9 years age bin, and the 9 to 16 years age bin), assign proper exposure parameters for each individual age group, sum cancer risks for individual age groups to estimate cancer risk for a 30-year exposure, and compare the summed cancer risk to South Coast AQMD CEQA significance threshold of 10 in a million for cancer risk to determine the level of significance in the Final MND.

Additional Recommended Mitigation Measures for Construction Air Quality Impacts

3. As stated above, the Proposed Project's construction NOx emissions were mitigated to 96 lbs/day, which were slightly below South Coast AQMD air quality CEQA significance threshold of 100 lbs/day for NOx emissions. To further reduce the Proposed Project's construction NOx emissions from mobile sources (e.g., 20,000 haul truck trips), and in addition to Mitigation Measure AQ-1, South Coast AQMD staff recommends that the Lead Agency incorporate the following mitigation measures in the Final MND. For more information on potential mitigation measures as guidance to the Lead Agency, please visit South Coast AQMD's CEQA Air Quality Handbook website⁸.
 - a) Require the use of zero-emission (ZE) or near-zero emission (NZE) on-road haul trucks (e.g., material delivery trucks and soil import/export) such as heavy-duty trucks with natural gas engines that meet the CARB's adopted optional NOx emission standard at 0.02 grams per brake horsepower-hour (g/bhp-hr). At a minimum, require that operators of heavy-duty trucks visiting the Proposed Project during operation commit to using 2010 model year⁹ or newer and cleaner engines that meet CARB's 2010 engine emission standards of 0.01 g/bhp-hr for particulate matter (PM) and the CARB's adopted optional NOx emission standard of 0.20 g/bhp-hr for NOx emissions. Include analyses to evaluate and identify sufficient power available for ZE trucks and supportive infrastructures in the Energy and Utilities and Service Systems Sections of the Final MND, where appropriate.
 - b) To monitor and ensure ZE, NZE, or 2010 model year trucks are used at the Proposed Project, the Lead Agency should require that operators maintain records of all trucks associated with the

⁷ *Ibid.* Appendix B. Health Risk Assessment.

⁸ South Coast AQMD. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.

⁹ CARB adopted the statewide On-Road Truck and Bus Regulation in 2010. The Regulation requires diesel trucks and buses that operate in California to be upgraded to reduce emissions. Newer heavier trucks and buses must meet particulate matter filter requirements beginning January 1, 2012. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent. More information on the CARB's Truck and Bus Regulations is available here: <https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm>.

Proposed Project's construction and make these records available to the Lead Agency upon request. The records will serve as evidence to prove that each truck called to the Proposed Project during construction meets the minimum 2010 model year engine emission standards. Alternatively, the Lead Agency should require periodic reporting and provision of written records by contractors and conduct regular inspections of the records to the maximum extent feasible and practicable.

- c) Maintain equipment maintenance records for the construction portion of the Proposed Project. All construction equipment must be tuned and maintained in compliance with the manufacturer's recommended maintenance schedule and specifications. All maintenance records for each equipment and their construction contractor(s) should be made available for inspection and remain on-site for a period of at least two years from completion of construction.
- d) Encourage construction contractors to apply for South Coast AQMD "SOON" funds. The "SOON" program provides funds to applicable fleets for the purchase of commercially-available low-emission heavy-duty engines to achieve near-term reduction of NOx emissions from in-use off-road diesel vehicles. More information on this program can be found at South Coast AQMD's website:<http://www.aqmd.gov/home/programs/business/business-detail?title=off-road-dieselengines>.
- e) Restrict non-essential diesel engine idle time to not more than five consecutive minutes or another time-frame as allowed by the California Code of Regulations, Title 13 section 2485 - CARB's Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling. For any vehicle delivery that is expected to take longer than five minutes, each project applicant, project sponsor, or public agency will require the vehicle's operator to shut off the engine. Notify the vendors of these idling requirements at the time that the purchase order is issued and again when vehicles enter the gates of the facility. To further ensure that drivers and operators understand the idling requirement, include the idling requirement in the training materials for drivers, operators, and vendors, post signs at the entry of the construction site and throughout the Proposed Project site stating that idling longer than five minutes is not permitted.

Recommended Mitigation Measures for Operational Air Quality Impacts

4. 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 significant adverse impacts. Due to close proximity to St. Paul High School and residences, South Coast AQMD staff recommends that the Lead Agency incorporate the following operational air quality mitigation measures in the Final MND.
 - a) Require the use of ZE) or NZE on-road haul trucks during operation, such as trucks with natural gas engines that meet the CARB's adopted optional NOx emission standard at 0.02 grams per brake horsepower-hour (g/bhp-hr). At a minimum, the Lead Agency may require that operators of heavy-duty trucks visiting the Proposed Project during operation commit to using 2010 model year or newer engines that meet CARB's 2010 engine emission standards of 0.01 g/bhp-hr for particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks. When requiring ZE or NZE on-road haul trucks, the Lead Agency should include analyses to evaluate and identify sufficient power and supportive infrastructure available for ZE/NZE trucks in the Energy and Utilities and Service Systems Sections of the Final MND, where appropriate.
 - b) To monitor and ensure ZE, NZE, or 2010 model year trucks are used at the Proposed Project, the Lead Agency should require that operators maintain records of all trucks associated with

the Proposed Project's construction and make these records available to the Lead Agency upon request. The records will serve as evidence to prove that each truck called to the Proposed Project during construction meets the minimum 2010 model year engine emission standards. Alternatively, the Lead Agency should require periodic reporting and provision of written records by contractors and conduct regular inspections of the records to the maximum extent feasible and practicable.

- c) Design the warehouse use of the Proposed Project as farthest away as feasible from St. Paul High School and residences that are located to the north and northeast of the Proposed Project. For example, the warehouse use may be located along the western boundary of the Proposed Project, such that the 46 dock doors, which are currently located near the eastern boundary of the Proposed Project adjacent to St. Paul High School and residences, will be facing west and away from the school and residences to minimize exposures to DPM from trucks entering/exiting and idling at the Proposed Project during operation.
- d) Require trucks visiting the Proposed Project to use the Santa Fe Springs designated truck route (i.e., Los Nietos Road to Santa Fe Springs Road to the I-605) that was used to analyze the Proposed Project's air quality and HRA analyses in the Final MND.
- e) Enforce primary truck access via the driveway on Santa Fe Springs Road and Los Nietos roads to ensure that trucks are as far away as possible from sensitive uses.
- f) Have truck routes clearly marked with trailblazer signs (e.g., no trucks traveling north on Greenleaf Avenue¹⁰), so that trucks will not enter residential areas that are adjacent to portions of the designated truck routes analyzed in the Final MND.
- g) Design the Proposed Project 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 and that truck traffic within the Proposed Project site is located away from the property line(s) closest to the sensitive receptors (e.g., residences and school).
- h) Establish area(s) within the Proposed Project site for repair needs and ensure that these designated areas are away from sensitive receptors (e.g., residences and school).

¹⁰ MND. Page 132.