



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 5175 Vincent Avenue Project

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.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to construct a 545,735-square-foot, high-cube warehouse on 26.05 acres (Proposed Project). The Proposed Project is located on the southwest corner of Arrow Highway and Vincent Avenue in the City of Irwindale. Although the exact use of the Proposed Project is unknown at this time, the Proposed Project will fall into one of the following five high-cube warehouse categories: fulfillment center, parcel hub, cold storage facility, transload facility, or short-term storage facility¹.

SCAQMD Staff's Summary of Air Quality Analysis

In the Air Quality Analysis section, the Lead Agency quantified the Proposed Project's construction and operational emissions and compared those emissions to SCAQMD's recommended regional air quality CEQA significance thresholds. Based on the analyses, the Lead Agency found that the Proposed Project's regional construction and operational air quality impacts would be less than significant. However, the Air Quality Analysis did not include a Localized Significance Thresholds (LSTs) analysis to determine the localized air quality impacts during construction. Additionally, the Lead Agency prepared a Health Risk Assessment (HRA) for the Proposed Project and found that the residential cancer risk would be 5.19 in one million which is below SCAQMD's CEQA significance threshold of 10 in one million for cancer risk².

On January 4, 2019, SCAQMD staff requested that the Lead Agency provide technical documents and modeling input and output files (not PDFs) related to the air quality and HRA analyses. The Lead Agency responded to the request but did not provide the electronic version of air dispersion modeling input and output files that were necessary to allow an appropriate review of the HRA modeling parameters at this time³. As such, SCAQMD staff's comments on the HRA analysis were based on a review of the discussion of modeling parameters that were provided in the MND and Appendix B.

SCAQMD Staff's General Comments

SCAQMD staff has comments regarding the methodology used to quantify the Proposed Project's construction and operational emissions and the modeling parameters for the HRA analysis. Since the

¹ MND. Introduction. Page 2.

² MND. Appendix B. Air Toxics Health Risk Assessment. Page 9.

³ SCAQMD staff received the Notice of Intent to Adopt a Mitigated Negative Declaration for the Proposed Project on January 4, 2019 and subsequently requested live modeling files on January 4, 2019.

exact use of the Proposed Project is unknown at this time, but it is expected to fall into one of the five high-cube warehouse use categories, including a cold storage facility⁴, SCAQMD staff recommends that the Lead Agency revise the Air Quality Analysis to reflect the most conservative, but reasonably foreseeable high-cube warehouse use in the Final MND. Please see the attachment for more information. If, upon revision, the Lead Agency finds that the Proposed Project will have significant, adverse air quality and health risks impacts, feasible mitigation will be required to reduce these impacts to less than significant pursuant to CEQA Guidelines Sections 15070 and 15071(e). The attachment also includes SCAQMD staff's recommended mitigation measures.

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 SCAQMD with written responses to all comments contained herein prior to the adoption of the Final MND. 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, informative, or useful to decision makers and 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 Alina Mullins, Assistant Air Quality Specialist, at amullins@aqmd.gov or (909) 396-2402, should you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment
LS:AM
LAC190104-01
Control Number

⁴ MND. Introduction. Page 2.

ATTACHMENT

Air Quality Analysis – Cold Storage Warehouse

1. The Lead Agency proposes to construct and operate an approximately 545,735-square-foot, high-cube warehouse. Occupants were unknown at the time when the MND was circulated for public review. The Lead Agency stated that the Proposed Project would fall into one of the following five high-cube warehouse categories: fulfillment center, parcel hub, cold storage facility, transload facility, or short-term storage facility⁵. As such, one of the reasonably foreseeable uses of the Proposed Project is a cold storage facility.

Transport refrigeration units (TRUs) are commonly in-use at cold storage warehouse facilities. While using TRUs is reasonably foreseeable for the Proposed Project, based on a review of the CalEEMod output worksheets in Appendix A to the MND, SCAQMD staff found that the “Unrefrigerated Warehouse-No Rail” land use was selected⁶. Additionally, according to the assumptions in Appendix B, the use of on-site truck TRUs was analyzed as a part of the HRA⁷. Therefore, to conservatively analyze the worst-case air quality impact scenario and to be consistent with the HRA analysis assumption, SCAQMD staff recommends that the Lead Agency revise the Air Quality Analysis to calculate and disclose the Proposed Project’s operational emissions from NO_x and diesel particulate matter from TRUs in the Final MND, unless the Lead Agency expressly restricts the use of the Proposed Project as a cold storage/refrigerated warehouse as a restricted conditional use.

Air Quality Analysis – Localized Significance Thresholds (LSTs) Analysis

2. Based on a review of aerial photographs, SCAQMD staff found that the Proposed Project is located in close proximity to sensitive receptors (e.g., residential uses). Sensitive receptors are people that have an increased sensitivity to air pollution or environmental contaminants. They include schools, parks, and playgrounds, daycare centers, nursing homes, elderly care facilities, hospitals and residential dwelling units. Upon review of the Air Quality Analysis, it did not appear that the Lead Agency quantified the Proposed Project’s localized construction emissions in the MND. Therefore, SCAQMD staff recommends that the Lead Agency quantify the localized emissions during construction in order to disclose the localized air quality impacts in the Final MND to ensure that nearby sensitive receptors are not adversely affected by the construction activities that are occurring in close proximity. SCAQMD guidance for performing a localized Air Quality Analysis is available on SCAQMD’s website⁸.

Air Quality Analysis - Trip Generation Rates

3. The Lead Agency used the Institute of Transportation Engineers (ITE) Trip Generation Manual 10th Edition Land Use Code of “150” for warehousing and the City of Fontana Truck Trip Generation Study to determine the Proposed Project’s Trip Generation⁹. The Trip Generation Rate that the Lead Agency used in the MND was 4.96 trips per 1,000 square feet. This resulted in a trip generation of approximately 2,708 vehicles. It is not clear to SCAQMD staff how the Lead Agency arrived at a trip generation rate of 4.96 trips. Additionally, since the use of the Proposed Project could fall within any of the five high-cube warehouse use categories discussed in the ITE Trip Generation Manual, SCAQMD staff is concerned that using the Trip Generation Land Use Code of “150” for warehousing may have led to an underestimation of the Proposed Project’s daily vehicle trips (i.e., an estimated 949 daily trips) and the operational emissions. As shown in Table 1: *SCAQMD Staff Estimated Daily*

⁵ *Ibid.*

⁶ MND. Appendix A. CalEEMod Outputs: Annual, Summer, and Winter Runs.

⁷ MND. Appendix B. Air Toxics Health Risk Assessment. Page 5.

⁸ SCAQMD. Localized Significance Thresholds. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

⁹ MND. Appendix C. Traffic Impact Analysis. Table 2: *Project Trip Generation*. Page 21.

Trips Based on ITE Land Use Codes 150, 154-157, a fulfillment center warehouse (Land Use Code 155) would have an estimated 4,464 daily trips, and a parcel hub warehouse (Land Use Code 156) would have an estimated 4,229 daily trips.

Table 1: SCAQMD Staff Estimated Daily Trips Based on ITE Land Use Codes 150, 154-157¹

Land Use Code	Name of Land Use	Brief Description of Land Use	Trip Generation Rate ²	Estimated Daily Trips ³
150	Warehousing	Devoted to storage of materials	1.74	949
	High-Cube Warehouse (Land Use Codes 154-157)	At least 200,000 gross with ceiling height of 24 square feet or more. Used for storage and/or consolidation of manufactured goods prior to distribution.		
154	High-Cube Transload Warehouse	High-efficiency distribution facilities for consolidation and distribution of pallet loads with little storage duration.	1.40	764
154	High-Cube Short-Term Storage Warehouse	High-efficiency distribution facilities for movement of large volumes of freight with short-term storage of products.	1.40	764
155	High-Cube Fulfillment Center Warehouse	Significant storage with direct distribution of ecommerce product to end users; smaller packages and quantities.	8.18	4,464
156	High-Cube Parcel Hub Warehouse	Regional and local freight forward facilities with time sensitive shipments via airfreight and ground carriers.	7.75	4,229
157	High-Cube Cold Storage Warehouse	Temperature-controlled environments for frozen food or other perishable products.	2.12	1,156

Source: SCAQMD. January 17, 2019.

Notes: 1. The table was generated by SCAQMD staff based on the information from the ITE, Trip Generation Manual, 10th Edition, 2017. 2. Trip Generation Rate per 1,000 square feet (tsf). 3. Vehicle Daily Trips were calculated by multiplying the Proposed Project's square footage (545,735 sf/1000 or 545.735 tsf) with the associated trip generation rate.

Given that the Proposed Project has five potential uses including a fulfillment center and a parcel hub, SCAQMD staff recommends that the Lead Agency revise the Air Quality Analysis based on a most conservative trip generation rate that is associated with the most impactful high-cube warehouse Land Use Code in the Final MND. In the case of the Proposed Project, this would be a high-cube fulfillment center followed by a high-cube parcel hub (Table 1). Alternatively, the Lead Agency should provide additional information in the Final MND to justify the use of Land Use Code of "150" for the Proposed Project and expressly restrict the use of the Proposed Project as a high-cube fulfillment center or a parcel hub.

Health Risk Assessment (HRA) Modeling Parameters

4. As stated above, SCAQMD staff's comments on the HRA analysis for the Proposed Project were based on a review of the discussion of modeling parameters since the Lead Agency did not provide the electronic modeling input and output files when requested. Without the electronic modeling input and output files, SCAQMD staff was not able to conduct a thorough review of the HRA analysis to determine its appropriateness for CEQA purposes. However, to facilitate the goal and purpose of a

MND as an informational document and to foster informed decision-making and public participation by providing additional information on the HRA modeling parameters, SCAQMD staff recommends that the Lead Agency provide the following information in the Final MND, at a minimum.

- Modeling parameters for on-site diesel truck idling and TRUs (i.e., provide more information regarding if sources were modeled individually as point sources or grouped together as one volume source)
- Modeling parameters used for the terrain data. If two AERMOD runs have been conducted based on the terrain data, the maximum ground-level concentration from both runs should be reported. Please see SCAQMD's Modeling Guidance for AERMOD for more information¹⁰.
- HARP2 modeling input parameters, such as the evaluated pathways (i.e., inhalation, soil, dermal, etc.)
- Modeling files and figures to show location of receptors and modeled sources for visual representation

Additional Recommended Mitigation Measures:

5. In the event that, after revisions to the Air Quality Analysis, new, significant air quality impacts are identified, SCAQMD staff recommends that the Lead Agency incorporate the following construction and operational mitigation measures. For more information on potential mitigation measures as guidance to the Lead Agency, please visit SCAQMD's CEQA Air Quality Handbook website¹¹.

Construction Air Quality Impacts

- Require the use off-road diesel-powered construction equipment rated at 50 horsepower or greater that meets or exceeds the CARB and U.S. EPA Tier 4 Tier 4 off-road emissions standards. To ensure that Tier 4 construction equipment or better will be used during the Proposed Project construction, SCAQMD staff recommends that the Lead Agency include this requirement in applicable bid documents, purchase orders, and contracts. Successful contractor(s) must demonstrate the ability to supply the compliant construction equipment for use prior to any ground disturbing and construction activities. A copy of each unit's certified tier specification or model year specification and CARB or SCAQMD operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment. Additionally, the Lead Agency should require periodic reporting and provision of written construction documents by construction contractor(s) to ensure compliance, and conduct regular inspections to the maximum extent feasible to ensure compliance. In the event that construction equipment cannot meet the Tier 4 engine certification, the Construction Contractor must demonstrate through future study with written findings supported by substantial evidence that is approved by the Lead Agency before using Tier 3 emissions standards compliant construction equipment and/or other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, reduction in the number and/or horsepower rating of construction equipment, limiting the number of daily construction haul truck trips to and from the Proposed Project using cleaner vehicle fuel, and/or limiting the number of individual construction project phases occurring simultaneously.
- In addition, if not already supplied with a factory-equipped diesel particulate filter, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what

¹⁰ South Coast Air Quality Management District. Modeling Guidance for AERMOD. Accessed at: <https://www.aqmd.gov/home/air-quality/air-quality-data-studies/meteorological-data/modeling-guidance>.

¹¹ South Coast Air Quality Management District. CEQA Air Quality Analysis Handbook. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.

could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. In addition, construction equipment shall incorporate, where feasible, emissions savings technology such as hybrid drives and specific fuel economy standards. In the event that any equipment required under this mitigation measure is not available, provide documentation as information becomes available. A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit at the time of mobilization of each applicable unit of equipment shall be provided. Encourage construction contractors to apply for SCAQMD "SOON" funding incentives to help accelerate the clean-up of off-road diesel vehicles, such as heavy duty construction equipment.

- Enter into a contract that notifies all vendors and construction contractors that construction vehicle and equipment idling time will be limited to no longer than five 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 understand the construction vehicle and equipment idling requirement, post signs at each facility entry gates and throughout the site stating idling longer than five minutes is not permitted.
- Evaluate the use of alternate fuels for on-site mobile construction equipment prior to the commencement of construction activities, provided that suitable equipment is available for the activity. Equipment vendors shall be contacted to determine the commercial availability of alternate-fueled construction equipment. Priority should be given during the bidding process for contractors committing to use alternate-fueled construction equipment.
- Maintain vehicle and equipment maintenance records for the construction portion of the proposed project. All construction vehicles must be maintained in compliance with the manufacturer's recommended maintenance schedule. The Lead Agency will maintain their construction equipment and the construction contractor will be responsible for maintaining their equipment and maintenance records. All maintenance records for each facility and their construction contractor(s) will remain on-site for a period of at least two years from completion of construction.
- Provide temporary traffic controls during all phases of significant construction activity to maintain smooth traffic flow, such as providing a flag person to direct the flow of traffic, providing dedicated turn lanes for the movement of construction trucks and equipment on- and off-site, re-routing construction trucks away from congested streets or sensitive receptor areas, coordinating with the local city to improve traffic flow by signal synchronization in the area near the construction site and scheduling construction activities that affect traffic flow on the arterial system to occur during off-peak hours to the greatest extent practicable.

Operational Air Quality Impacts from Mobile Sources

- Require zero-emissions or near-zero emission on-road haul trucks, such as heavy-duty trucks with natural gas engines that meet the California Air Resources Board (CARB)'s adopted optional NO_x emissions standard at 0.02 grams per brake horsepower-hour (g/bhp-hr). At a minimum, require that construction vendors, contractors, and/or haul truck operators commit to using 2010 model year or newer trucks (e.g., material delivery trucks and soil and aggregate import/export)

that meet CARB's 2010 engine emission standards of 0.01 g/bhp-hr of particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks.

- Enter into a contract that notifies all vendors that vehicle idling time will be limited to no longer than five 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 delivery vehicle that is expected to take longer than five minutes, the vehicle's operator shall be required to shut off the engine. Notify the vendors of these idling requirements at the time that the delivery purchase order is issued and again when vehicles enter the gates of the facility. To further ensure that drivers understand the vehicle idling requirement, post signs at the facility's entry gates stating that idling longer than five minutes is not permitted.
- Require trucks to use the truck route that was analyzed in the Health Risk Assessment of the Final MND.
- Have truck routes clearly marked with trailblazer signs so that trucks will not enter residential areas.
- Limit the daily number of truck trips allowed at the Proposed Project to the level that was analyzed in the Final MND (830 truck trip-ends per day). If higher daily truck volumes are anticipated during operation, the Lead Agency should commit to re-evaluating the Proposed Project's air quality impacts through CEQA prior to allowing higher activity levels.
- Design the Proposed Project such that entrances and exits are such that trucks are not traversing past neighbors or other sensitive receptors.
- 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.
- Design the Proposed Project 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.
- Provide incentives for employees in order to encourage the use of public transportation or carpooling, such as discounted transit passes or carpool rebates. If the employer of the warehouse employs 250 or more employees on site, on a full or part-time basis, encourage the employer to implement an Employee Commute Reduction Project (ECRP) under SCAQMD Rule 2202, On-Road Motor Vehicle Mitigation Option. For more information on Rule 2202 and guidelines for the ECRP, please visit SCAQMD's website at: <http://www.aqmd.gov/home/program/business/business-detail?title=rule-2202-on-road-motor-vehicle-mitigation-options>.
- Implement a rideshare program for employees and set a goal to achieve a certain participation rate over a period of time.
- Require the use of electric forklifts and yard equipment, if commercially available.

Operational Air Quality Impacts from Area Sources

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.
- Require the use of electric landscaping equipment, such as lawn mowers and leaf blowers.
- Require use of electric or alternatively fueled sweepers with HEPA filters.
- 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.
- Use of water-based or low VOC cleaning products that go beyond the requirements under SCAQMD Rule 1113.

SCAQMD Permits & Rules

In the event that operation of the Proposed Project will require the use of stationary diesel-fueled internal combustion or compression engines (i.e., generators or firefighting equipment), the Final MND should include a discussion to demonstrate compliance with SCAQMD Rule 1470 – Requirement for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines¹² and SCAQMD Rule Series 1146 – Emissions of Oxides of Nitrogen from Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters¹³, including Rule 1146.1 – Emissions of Oxides of Nitrogen from Small Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters¹⁴ and Rule 1146.2 - Emissions of Oxides of Nitrogen from Large Water Heaters and Small Boilers and Process Heaters¹⁵. Additionally, since the use of stationary diesel-fueled internal combustion or compression engines requires a permit from SCAQMD, the Lead Agency should identify SCAQMD as a Responsible Agency for the Proposed Project in the Final MND. For more information on permits, please visit SCAQMD's webpage at: <http://www.aqmd.gov/home/permits>. Questions on permits can be directed to SCAQMD's Engineering and Permitting staff at (909) 396-3385.

¹² South Coast Air Quality Management District. Rule 1470 – Requirement for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf>.

¹³ South Coast Air Quality Management District. Rule 1146 – Emissions of Oxides of Nitrogen from Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1146.pdf>.

¹⁴ South Coast Air Quality Management District. Rule 1146.1 – Emissions of Oxides of Nitrogen from Small Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1146-1.pdf>.

¹⁵ South Coast Air Quality Management District. Rule 1146.2 – Emissions of Oxides of Nitrogen from Large Water Heaters and Small Boilers and Process Heaters. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1146-2.pdf>.