



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

October 22, 2019

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Mitigated Negative Declaration (MND) for the Proposed Bridge Point South Bay II Warehouse 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 203,877-square-foot non-refrigerated warehouse, including 21 dock doors on 8.98 acres (Proposed Project). The Proposed Project is located at 20850 South Normandie Avenue on the southeast corner of South Normandie Avenue and Torrance Boulevard in the unincorporated community of West Carson in Los Angeles County. Upon reviews of Figure 3, *Aerial View of Site and Surroundings*, in the MND and aerial photographs, South Coast AQMD staff found that the closest sensitive receptor is located within 15 feet of the Proposed Project¹, and multiple residential uses are located to the north, west, and east of the Proposed Project². Construction of the Proposed Project is anticipated to occur over 12 months, with operation beginning in 2020³. During operation, the Proposed Project is expected to generate approximately 74 heavy-duty, diesel-fueled truck trips day⁴.

South Coast AQMD 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 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 construction and operational air quality impacts would be less than significant, after the implementation of Mitigation Measure (MM) 3-1. MM 3-1 requires the construction contractor to implement dust control measures, use a PM10-efficient street sweeper once per day, and schedule construction activities in accordance with South Coast AQMD directives. Additionally, the Lead Agency is committed to Project Design Feature (PDF) 3-1 and PDF 3-2, which require the use of Tier 4 construction equipment and 2010 or newer on-road haul trucks during construction⁵. The Lead Agency also prepared a mobile source Health Risk Assessment (HRA) analysis and found that the maximum incremental cancer risk would be 4.6 in one million⁶, which is below South Coast AQMD's CEQA significance threshold of 10 in one million for cancer risk⁷.

¹ *Ibid.* Table 3-4 – *Construction-Related Local Criteria Pollutant Emissions – Prior to Mitigation*. Footnote 4. Page 56.

² MND. Figure 3, *Aerial View of Site and Surroundings*. Page 19.

³ *Ibid.* Appendix B, *Air Quality, Greenhouse Gas, and Health Risk Assessment*. Page 51.

⁴ *Ibid.* Page 57.

⁵ *Ibid.* Page 63.

⁶ *Ibid.* Table 3-8 – *TAC Cancer Risks at Nearby Sensitive Receptors*. Page 68.

⁷ South Coast AQMD has developed the CEQA significance threshold of 10 in one million for cancer risk. When South Coast AQMD acts as the Lead Agency, South Coast AQMD staff conducts a HRA, compares the maximum cancer risk to the threshold of 10 in one million to determine the level of significance for health risk impacts, and identifies mitigation measures if the risk is found to be significant.

South Coast AQMD Staff's General Comments

To further reduce the air quality and health risk impacts to the existing sensitive receptors that are located in close proximity to the Proposed Project, South Coast AQMD staff recommends that the Lead Agency incorporate additional mitigation measures in the Final MND. Please see the attachment for more information.

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, if the Lead Agency makes a finding that additional recommended mitigation measures are not feasible, the Lead Agency should describe the specific reasons for rejecting or substituting these mitigation measures in the Final MND (CEQA Guidelines Section 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 me at lsun@aqmd.gov, should you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment

LS:RD

LAC190920-01

Control Number

ATTACHMENT

Recommended Air Quality Mitigation Measures – Operational Air Quality Impacts

1. To further reduce air quality and health risk impacts to the existing residences located within 15 feet of the Proposed Project, South Coast AQMD staff recommends that the Lead Agency incorporate the following operational 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.

Mitigation Measures for Operational Air Quality Impacts from Mobile Sources

- a. Require the use of zero emission (ZE) or near-zero emission (NZE) heavy-duty trucks during operation, such as trucks with natural gas engines that meet the California Air Resources Board's (CARB) adopted optional NOx emission standard of 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 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. Include analyses to evaluate and identify sufficient power available for ZE trucks and supportive infrastructure in the Energy and Utilities and Service Systems Sections of the Final MND, where appropriate.

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 operation, 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 operation meets the minimum 2010 model year engine emission standards. Alternatively, the Lead Agency should require periodic reporting and provision of written records by operators, and conduct regular inspections of the records to the maximum extent feasible and practicable.

- b. Design the Proposed Project such that the dock doors are located as far away as feasible from the residences located north, south, and east of the Proposed Project. This could minimize the exposure of sensitive receptors to diesel particulate matter from trucks entering, exiting, and idling at the Proposed Project.
- c. 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 (e.g., residences), where feasible.
- d. Design the Proposed Project such that entrances and exits are such that trucks are not traversing past sensitive receptors (e.g., residences) located in close proximity to the Proposed Project. Currently, the northeast truck entrance is located in close proximity to the existing residence. The Lead Agency should consider all potential site configurations to minimize trucks queuing and/or idling adjacent to the existing residences.
- e. 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 ensure that truck

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>.

traffic within the Proposed Project site is located away from the property line(s) closest to the sensitive receptors (e.g., residences).

- f. Limit the daily number of truck trips allowed at the Proposed Project to the level that was analyzed in the Final MND (e.g., 74 daily truck trips). If higher daily truck volumes are anticipated during operation than what was analyzed in the certified Final MND, the Lead Agency should commit to re-evaluating the Proposed Project's air quality and health risks impacts through a CEQA process prior to allowing higher activity levels (CEQA Guidelines Section 15162).
- g. Require trucks to use the truck routes that were used to analyze the air quality and HRA impacts in the Final MND.
- h. Have truck routes clearly marked with trailblazer signs, so that trucks will not enter residential areas that are adjacent to portions of the designated truck routes analyzed in the Final MND.
- i. Restrict overnight truck parking in residential areas. Establish parking within the Proposed Project where trucks can rest overnight.
- j. Establish area(s) within the Proposed Project site for repair needs and ensure that these designated areas are away from any sensitive land uses.

Mitigation Measures for Operational Air Quality Impacts from Area Sources

- a. Maximize the use of solar energy including solar panels. Installing the maximum possible number of solar energy arrays on the building roofs and/or on the Proposed Project site to generate solar energy for the warehouse and/or EV charging stations.
- b. Require the use of electric landscaping equipment, such as lawn mowers and leaf blowers.
- c. Require use of electric or alternatively fueled sweepers with HEPA filters.
- d. Maximize the planting of trees in landscaping and parking lots.
- e. Use light colored paving and roofing materials.
- f. Utilize only Energy Star heating, cooling, and lighting devices, and appliances.

Guidance Regarding Warehouses Sited Near Sensitive Receptors

2. South Coast AQMD staff recognizes that there are many factors Lead Agencies must consider when making local planning and land use decisions. To facilitate stronger collaboration between Lead Agencies and South Coast AQMD to reduce community exposure to source-specific and cumulative air pollution impacts, South Coast AQMD adopted the *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*¹⁰ in 2005. Additional guidance is available in the California Air Resources Board (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective*, available at: <https://www.arb.ca.gov/ch/handbook.pdf>. For warehouses that accommodate more than 100 trucks per day, or more than 40 trucks with operating TRUs per day, a 1,000-foot separation between sensitive land uses (e.g., residential uses)¹¹ and the operating warehouse is recommended. While the Proposed Project would generate approximately 74 truck trips per day, which is less than CARB's

¹⁰ South Coast AQMD. May 2005. *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*. Accessed at: <http://www.aqmd.gov/home/library/documents-support-material/planning-guidance/guidance-document>.

¹¹CARB. *Air Quality and Land Use Handbook: A Community Health Perspective*. Page 4. Accessed at: <https://www.arb.ca.gov/ch/handbook.pdf>.

guidance of 100 trucks per day, due to the close proximity of the residence to the Proposed Project (within 15 feet), South Coast AQMD staff recommends that the Lead Agency review and consider these guidance when making local planning and land use decisions.

Responsible Agency, Permits, and Compliance with South Coast AQMD Rules

3. Implementation of the Proposed Project may require permits from South Coast AQMD. If operation of the Proposed Project will involve the use of any stationary diesel-fueled internal combustion or compression engines (i.e., generators or firefighting equipment), South Coast AQMD Rule 1470 – Requirement for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines¹² and South Coast AQMD 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 would apply and should be discussed in the Air Quality Section of the Final MND. Additionally, in the event that the use of three or more Stationary Emergency Standby Diesel-Fueled Internal Combustion Engines rated at greater than 50 brake horsepower (>50 bhp) is reasonably foreseeable, the Lead Agency should include a discussion on South Coast AQMD Rule 1472 – Requirement for Facilities with Multiple Stationary Emergency Standby Diesel-Fueled Internal Combustion¹⁶. Therefore, South Coast AQMD staff recommends that the Lead Agency consult with South Coast AQMD Permitting and Engineering staff as early as feasible to determine permit requirements and any applicable rules and regulations that should be discussed in the Final MND for the Proposed Project. Additionally, in the event that the Proposed Project will use new stationary equipment that requires a permit from South Coast AQMD, the Lead Agency should identify South Coast AQMD as a Responsible Agency for the Proposed Project in the Final MND. Questions on permits and applicable South Coast AQMD rules can directed to South Coast AQMD’s Engineering and Permitting staff at (909) 396-3385. For more general information on permits, please visit South Coast AQMD’s webpage at: <http://www.aqmd.gov/home/permits>.

¹² South Coast AQMD. 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 AQMD. 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 AQMD. 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 AQMD. 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>.

¹⁶ South Coast AQMD. Rule 1472 – Requirements for Facilities with Multiple Stationary Emergency Standby Diesel-Fueled Internal Combustion Engines. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1472.pdf>.