



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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Draft Environmental Impact Report (EIR) for the Proposed Prologis Vermont and Redondo Project (Proposed Project) (SCH No.: 2017121007)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The City of Los Angeles is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. South Coast AQMD staff previously submitted comments on a Mitigated Negative Declaration put forward by the Lead Agency in December 2017 for the Proposed Project¹, which involved construction of a 466,402-square-foot warehouse on 697,271 square feet. In February 2020, the Lead Agency initiated the preparation of a Draft EIR for the Proposed Project and released the Draft EIR for public review and comments in August 2021. The following comments on the Draft EIR include the CEQA air dispersion modeling parameters, recommended additional operational mitigation measures, and a discussion of South Coast AQMD permits that the Lead Agency should include in the Final EIR.

Based on the Draft EIR, the Proposed Project consists of construction and operation of a 340,298-square-foot warehouse. The Proposed Project is located on the northwest corner of Orchard Avenue and Redondo Beach at 15116-15216 South Vermont Avenue and 747-861 West Redondo Beach in the community of Harbor Gateway within the City of Los Angeles.

Construction of the Proposed Project is anticipated to begin in October 2021 and will be completed in June 2022². The Proposed Project will include six project design features: installation of 20 electric vehicle (EV) charging stations for passenger vehicles; installation of 44 additional parking stalls capable of supporting EV charging in the future, six of which are for tractor trailers; installation of a solar photovoltaic system capable of generating 460,000 kilowatt-hours of renewable energy per year; installation of a roof with solar reflectance capabilities; use of all electric forklifts during operation; and LEED certification³. Once operational, the Proposed Project is anticipated to generate 1,977 average daily trips, 768 of which would be made by light-, medium-, and heavy-heavy-duty trucks⁴. Although the tenant for the Proposed Project is unknown, the Proposed Project is conditionally permitted to only allow future uses such as warehousing and distribution, manufacturing, and transload/short-term

¹ South Coast AQMD staff. December 19, 2017. Accessed at: <http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2017/mnd-15116vermontave-121917.pdf>.

² Draft EIR. Chapter IV-B Air Quality. Page IV.B-25.

³ *Ibid.* Page IV.B-28.

⁴ *Ibid.* Page IV.B-36.

storage, and is restricted from being used as fulfilment center or cold storage warehouse⁵. Based on the Draft EIR, existing sensitive receptors are within 100 feet of the Proposed Project⁶.

Based on a review of the Draft EIR and supporting technical documents, South Coast AQMD staff has three main comments. A summary of these comments is provided as follows with additional details provided in the attachment.

1. Air Dispersion Modeling Parameters: The air dispersion modeling performed in the Draft EIR did not utilize a uniform Cartesian grid. To identify the maximum impacted receptors from operation of the Proposed Project, South Coast AQMD staff recommends that the Lead Agency revise these parameters in the Final EIR.
2. Additional Recommended Mitigation Measure: CEQA requires that the Lead Agency considers all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse air quality impacts. South Coast AQMD staff recommends the Lead Agency include additional mitigation measures to further reduce the Proposed Project's significant and unavoidable operational air quality impacts from NOx emissions.
3. Responsible Agency and South Coast AQMD Permits: If the Proposed Project will require use of stationary equipment such as emergency generators and fire pumps, permit(s) from South Coast AQMD will be required. Therefore, South Coast AQMD staff recommends the Lead Agency identify stationary equipment that will be required during operation and identify South Coast AQMD as a CEQA Responsible Agency for the Proposed Project in the Final EIR.

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 Alina Mullins, Air Quality Specialist, at amullins@aqmd.gov, should you have any questions or wish to discuss the comments.

Sincerely,

Lijin Sun

Lijin Sun

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment
LS:AM
LAC210819-12
Control Number

⁵ Draft EIR. Chapter II Project Description. Page II-10.

⁶ Draft EIR. Chapter IV-B Air Quality. Page IV-B.18.

ATTACHMENT**South Coast AQMD Staff's Summary of Air Quality Analysis and Health Risk Assessment in the Draft EIR**

In the Air Quality Analysis Section of the Draft EIR, the Lead Agency quantified the Proposed Project's maximum daily construction and operational emissions. Construction emissions included demolition and hauling of 1,000 tons of contaminated asphalt⁷. The Lead Agency compared both construction and operational emissions to South Coast AQMD's recommended regional 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 with an estimated 142 pounds per day (lbs/day) of VOC emissions⁸, which is above South Coast AQMD's CEQA significance threshold for regional construction VOC emissions at 75 lbs/day. Mitigation Measure (MM) AQ-MM-1 and AQ-MM-2 would require the use of architectural coatings that limit the VOC content to 25 grams per liter for interior and exterior coatings and 50 grams per liter for parking lot coatings.

The Lead Agency also found that that the Proposed Project's regional operational air quality impacts would be significant with an estimated 183 lbs/day of NOx emissions, which is above South Coast AQMD's CEQA significance threshold for regional operational NOx emissions at 55 lbs/day. Implementation of AQ-MM-3 to AQ-MM-6 would require idling restriction signage, all electric landscape equipment, and the use of on-road diesel-fueled trucks utilized for daily operations to meet 2010 emission standards to reduce operational-related NOx emissions from mobile sources; however, the Lead Agency found that operation of the Proposed Project would still result in significant and unavoidable air quality impacts with NOx emissions at 135 lbs/day during operation⁹.

In the Draft EIR, the Lead Agency also quantified the Proposed Project's localized construction and operational emissions and compared them to the applicable South Coast AQMD's localized significance thresholds. Based on the analysis, the Lead Agency found that the Proposed Project's localized construction and operational air quality impacts would be less than significant¹⁰. Additionally, the Lead Agency conducted a Health Risk Assessment (HRA) for the Proposed Project's construction and operational activities. Construction and operational activities were found to result in a cancer inhalation risk of 2.6 in one million and 5.2 in one million¹¹, respectively and would not exceed South Coast AQMD's CEQA significance threshold of 10 in one million for cancer risk¹².

In the Draft EIR, the Lead Agency discussed South Coast AQMD Rules 2305 and 316¹³, which were adopted by South Coast AQMD's Governing Board on May 7, 2021. Rule 2305 –

⁷ Draft EIR. Chapter IV-B Air Quality, Page IV.B-25; Chapter IV-G Hazards and Hazardous Materials, Page IV.G-26.

⁸ Draft EIR. Chapter IV-B Air Quality, Page IV.B-35.

⁹ *Ibid.* Pages IV.B-35 to IV.B-40.

¹⁰ *Ibid.* Pages IV.B-42 to IV.B-45.

¹¹ *Ibid.* 4.2-49.

¹² South Coast AQMD's CEQA significance threshold of 10 in one million for cancer risk is based on the most current methodology recommended by the California Office of Environmental Health Hazard assessment.

¹³ Draft EIR. Page IV.B-12.

Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program, and Rule 316 – Fees for Rule 2305. Rules 2305 and 316 are new rules that will reduce regional and local emissions of NO_x and particulate matter (PM), including diesel PM.

South Coast AQMD staff's detailed comments on the Draft EIR is provided as follows.

1. Air Dispersion Modeling Parameters

To analyze the Proposed Project's health risk impacts, the Lead Agency performed project-specific air dispersion modeling in the Draft EIR. South Coast AQMD staff recommends that the Lead Agency revise the modeling parameters based on the following comment.

Upon review of the air dispersion modeling files, the Lead Agency identified 1,089 discrete receptors¹⁴. The 1,089 discrete receptors were placed in clusters to the North, South, and West of the Proposed Project site to represent the existing nearby residential, health, and educational land uses. No discrete receptors were placed within the boundary of the Rosecrans Recreation Center and Park, adjacent to the Proposed Project. This is not appropriate because this may not have captured peak concentrations, and therefore the maximum impacted receptors from operation of the Proposed Project. Based on a review of aerial photographs, South Coast AQMD staff found that the Rosecrans Recreation Center and Park has several outdoor sports fields, a playground, and a surface public parking lot. Because the general public has access to the Rosecrans Recreation Center and Park, receptors should have been placed within the Park as it is considered to be ambient air. Therefore, South Coast AQMD staff recommends that the Lead Agency revise the air dispersion modeling to use a uniform Cartesian grid with a spacing of 100 meters or less for all distances less than 1,000 feet¹⁵ in the Final EIR or provide information to demonstrate that the peak concentrations were identified with the use of discrete receptors, which did not include placement of receptors at the Rosecrans Recreation Center and Park adjacent to the Proposed Project.

2. Additional Recommended Mitigation Measures

In the Draft EIR, the Lead Agency is committed to operational mitigation measures MM-AQ-3 to MM-AQ-6. While these measures require idling restriction signage, all electric landscape equipment, and the use of on-road diesel-fueled trucks utilized for daily operations to meet 2010 emission standards, operational-related NO_x emissions would result in significant and unavoidable air quality impacts. CEQA requires that the Lead Agency considers mitigation measures to minimize significant adverse impacts (CEQA Guidelines Section 15126.4) and that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse impacts. South Coast AQMD staff recommends that the Lead Agency consider including the following operational mitigation measures in the Final EIR to further reduce the Proposed Project's operational NO_x emissions from mobile sources that will be attracted to the Proposed Project during operation.

¹⁴ Draft EIR. Technical Data Files. AERMOD file "PRO01_op".

¹⁵ South Coast AQMD Modeling Guidance for AERMOD. Accessed at: <http://www.aqmd.gov/home/air-quality/meteorological-data/modeling-guidance#Receptor>.

Mitigation measures for operational air quality impacts from mobile sources that the Lead Agency should consider in the Draft EIR may include the following:

- Require the use of zero-emissions (ZE) or near-zero emission (NZE) on-road trucks during operation such as heavy-duty trucks with natural gas engines that meet the CARB's adopted optional NO_x emissions standard at 0.02 grams per brake horsepower-hour (g/bhp-hr), if and when feasible. Given the state's clean truck rules and regulations aiming to accelerate the utilization and market penetration of ZE and NZE trucks such as the Advanced Clean Trucks Rule¹⁶ and the Heavy-Duty Low NO_x Omnibus Regulation¹⁷, ZE and NZE trucks will become increasingly more available to use, especially during the operational lifetime of the Proposed Project, which begins in 2022. The Lead Agency should require a phase-in schedule to incentive the use of these cleaner operating trucks to reduce any significant adverse air quality impacts during operation. South Coast AQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency. Include these truck requirements in applicable bid documents, purchase orders, and contracts. Operators shall maintain records of all trucks associated with project construction to document that each truck used meets these emission standards, and make the records available for inspection.
- In the Draft EIR, the Lead Agency explains that the Proposed Project will require the use of one diesel-fueled yard tractor/truck¹⁸. ZE battery-electric yard trucks are commercially available today and should be required for use during operation of the Proposed Project.
- Limit the daily number of trucks allowed at the Proposed Project to levels analyzed in the Final 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 a higher activity level.

Design considerations for the Proposed Project that the Lead Agency should consider to further reduce air quality and health risk impacts include the following:

- In the Draft EIR, the Lead Agency explains that during operations, “[...] [t]he truck route includes neighboring surface streets as well as both the I-110 southbound and northbound on- and off-ramps”.¹⁹ South Coast AQMD staff recommends that the Lead Agency restrict truck travel to avoid traversing through residential surface streets or streets next to schools, day care centers and other sensitive land uses. Additionally, the Lead Agency should clearly mark truck routes with trailblazer signs so that trucks will not traverse through areas next to or near sensitive land uses (e.g., residences, schools, day care centers, etc.).

¹⁶ CARB. June 25, 2020. *Advanced Clean Trucks Rule*. Accessed at: <https://ww2.arb.ca.gov/our-work/programs/advanced-clean-trucks>.

¹⁷ CARB has recently passed a variety of new regulations that require new, cleaner heavy-duty truck technology to be sold and used in state. For example, on August 27, 2020, CARB approved the Heavy-Duty Low NO_x Omnibus Regulation, which will require all trucks to meet the adopted emission standard of 0.05 g/hp-hr starting with engine model year 2024. Accessed at: <https://ww2.arb.ca.gov/rulemaking/2020/hdomnibuslownox>.

¹⁸ Draft EIR. Chapter IV.B Air Quality. Page IV.B-26.

¹⁹ Draft EIR. Appendix C AQ_GHG Appendix. Health Risk Assessment. Page 11.

- Restrict overnight truck parking in sensitive land uses by providing overnight truck parking inside the Proposed Project site.

3. Responsible Agency and South Coast AQMD Permits

If implementation of the Proposed Project requires the use of stationary equipment, including but not limited to, emergency generators and emergency fire pumps, permits from South Coast AQMD are required. The Final EIR should include a discussion on stationary equipment and identify South Coast AQMD as a Responsible Agency for the Proposed Project. Any assumptions used in the Final EIR will be used as the basis for permit conditions and limits for the Proposed Project. The 2015 revised Office of Environmental Health Hazard Assessment (OEHHA) methodology is being used by South Coast AQMD for determining operational health risks for permitting applications and also for all CEQA projects where South Coast AQMD is the Lead Agency. Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions on permits. For more general information on permits, please visit South Coast AQMD's webpage at: <http://www.aqmd.gov/home/permits>.

Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), South Coast AQMD staff requests that the Lead Agency provide South Coast AQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, issues raised in the comments should be addressed in detail 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 will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and to the public who are interested in the Proposed Project. Further, if the Lead Agency makes the finding that the recommended additional mitigation measures are not feasible, the Lead Agency should describe the specific reasons supported by substantial evidence for rejecting them in the Final EIR (CEQA Guidelines Section 15091).