Review of SCAQMD Staff Comments and Testimony on Warehouse Projects

Southern California Leadership Council
Goods Movement/Warehousing Working Group
March 14, 2014
Four Key Factors for SCAQMD Staff CEQA Commenting

1. Potential for Air Quality/Public Health Impacts
   – Project has potential for high emissions or health risk

2. Application of CEQA Guidelines
   – Appropriate CEQA document, baseline, etc.

3. Air Quality Analysis
   – Appropriate emission calculations, emission factors, trip length, truck trip rate, fleet mix, etc.
   – Complete air quality analysis – health risk, localized criteria pollutant, etc.

4. Mitigation
   – Additional opportunity for mitigation to reduce significant impacts
Additional Considerations for SCAQMD Staff Commenting

• Comments not adequately addressed in Final CEQA document
• Environmental justice area
• Availability of staff resources
## Examples of Warehouse Projects SCAQMD Staff Testified and Key Areas of Concern

<table>
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<tr>
<th>Project Jurisdiction</th>
<th>Air Quality/ Public Health Impact</th>
<th>Application of CEQA Guidelines</th>
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<tr>
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<td>Banning Business Park</td>
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<td>Substantial</td>
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<td>Banning</td>
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* Received CEQA document day before the hearing. Submitted letter day of hearing.
Heartland Specific Plan
Background

• Proposed Project
  – 5 million square foot warehouse project in Beaumont
  – Addendum to residential development

• SCAQMD staff submitted comment letter for Addendum

• SCAQMD staff testified to the City Council
Heartland Specific Plan
Key Concerns

• Application of CEQA Guidelines
  – Prepared an Addendum – No public comment required under CEQA for Addendum
  – CEQA document relied on 20 year old EIR – for a mostly residential development
  – Concerned citizen contacted SCAQMD one day prior to First City Council Hearing
  – Inappropriate CEQA Baseline led to incorrect CEQA document - assumed full build out of existing plan as baseline

• Potential for Air Quality/Public Health Impacts
  – 5 million square foot warehouse, third largest at this time
  – Potential impacts from trucks not analyzed
Heartland Specific Plan
Key Concerns (Continued)

• Air Quality Analysis
  – 9 mile truck trip length (typically 40 miles)
  – Only 4% heavy duty diesel trucks assumed in fleet mix (typically 20% diesel trucks)
  – No risk assessment to estimate health risk from trucks (risk assessment standard on warehouse projects)
  – No analysis of localized criteria pollutant analysis (localized analysis standard on warehouse projects)

• Mitigation
  – No mitigation provided for diesel trucks
Heartland Specific Plan
Project Outcome

• Project denied by City Council – concerns regarding
  – CEQA process
  – Air quality
  – Quality of warehousing jobs
  – Zoning
World Logistics Center
Background

- Proposed Project
  - 41.6 million square foot of warehousing in a specific plan
  - Final EIR not yet released
- SCAQMD staff submitted comment letters on Specific Plan, NOP, and DEIR
- SCAQMD staff testified at Scoping Meeting
- Final EIR being completed
World Logistics Center
Key Concerns

• Air Quality/Public Health Impact
  – Significant health risk affects large area (MICR 77 in a million)
  – Very high NOx: 3,059 lb/day

• Mitigation
  – DEIR includes mitigation below, yet still yields high impacts:
    • 100% 2010 standard trucks
    • Onsite alternative fueling station
    • Onsite supporting businesses (food, fuel, etc.)
    • Signage for truck routes and anti-idling
    • Onsite diesel minimization (100% alt. fuel for onsite equipment, staff training, data logging)
March Business Center

Background

• Proposed Project
  – 1.5 million square foot warehouse
• SCAQMD staff testified at Planning Commission and City Council
March Business Center
Key Concerns

• Air Quality/Public Health Impact
  – High NOx impact: 708 lbs/day
  – Less than significant project risk: 4 in a million
  – Cumulative risks not analyzed: At least 10 other nearby warehouse projects will use same truck routes
March Business Center
Key Concerns and Project Outcome

• Mitigation
  – SCAQMD staff recommendations - not incorporated
    • 2010 trucks fleet or phase-in schedule for 2010 truck fleet
    • Alternative fueling infrastructure
    • Implement advanced truck technology program
    • Commit to require tenants to apply for funding to retrofit and replace older trucks
    • Alternative fueled hostlers

• Project Outcome
  – Project approved by lead agency
  – Project litigated by community groups (Air quality one of several issues)
Banning Business Park Background

• Proposed Project
  – 1.2 Million square feet in 12 buildings
  – Mitigated Negative Declaration certified by lead agency
  – Draft MND assumed <2% heavy duty trucks, but traffic study assumed 12% heavy duty trucks
  – 12% heavy duty trucks would yield significant air quality impacts
  – SCAQMD staff recommended 2010 truck fleet or EIR
Banning Business Park
Key Concerns and Project Outcome

• Mitigation Measure
  – Lead agency/applicant committed to 2010 truck fleet
  – First warehouse project that SCAQMD staff was aware of that committed to 2010 truck fleet

• Project Outcome
  – SCAQMD staff testified to City Council acknowledging commitment for a 2010 truck fleet
  – Project approved by City Council
Status of High Cube Warehouse Truck Trip Study
SCAQMD High Cube Warehouse Truck Trip Study

- SCAQMD staff overseeing study on high cube warehouse truck trip rates for use in CEQA air quality analyses
- 13 stakeholder meetings to date
- Data collection completed by traffic engineers
  - Business survey
  - Trip counts
- Data analysis underway by UC Riverside
- Preliminary observations pending statistical verification
  - Warehouses with refrigerated trucks
  - E-commerce related warehouses
  - Overall trip rate
  - Truck trip rate
  - 95% confidence significant factor
- Materials available online
  - [http://www.aqmd.gov/ceqa/Warehouse/Warehouse.html](http://www.aqmd.gov/ceqa/Warehouse/Warehouse.html)
Western Riverside COG
“Good Neighbor” Guidelines
Goals of WRCOG
“Good Neighbor” Guidelines

• Guidelines developed in 2005 to:
  – “Provide local governments with specific strategies that can be considered and implemented to minimize potential diesel impacts from new warehouse and distribution centers”
  – “Educate existing warehouse and distribution centers about strategies that can be implemented to minimize potential diesel impacts from their operations”

• Guidelines available online:
SCAQMD CEQA Comments
Consistent with WRCOG Guidelines

• Recommended mitigation in WRCOG Guidelines:
  – Buffer zones
  – Encourage fleet owners to replace existing diesel fleets with “new model vehicles and/or cleaner technologies, such as electric or compressed natural gas”
  – Reduce diesel trucking activity outside of warehouses
  – Reduce onsite idling
  – Place clearly marked truck routes away from sensitive receptors
  – Encourage alternative fueling infrastructure
  – Educate workers and truckers about impacts from diesel and available resources to reduce impacts