



South Coast Air Quality Management District

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July 11, 2013

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Draft Environmental Impact Report (Draft EIR) for the Proposed Bell Business Center Project (SCH No. 2013041025)

The South Coast Air Quality Management District (SCAQMD) 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 CEQA document. We appreciate the lead agency considering these late comments, especially since we did not receive the full technical modeling information until July 9.

The lead agency proposes to construct four buildings totaling 840,390 square feet of building space on eight existing parcels for prospective new industrial/warehouse and associated office space uses on a total of 40.2 acres. The proposed project is planned to operate 24 hours per day, seven days per week. Additional building activities will include other on-site improvements and an extension to Rickenbacker Road for site access. Construction would start in early 2015 and project operations would begin in February 2017.

The SCAQMD staff requests that the vehicle fleet mixture and trip lengths used in the supporting air quality and health effect analyses be more fully explained to support the lead agency's determinations that these impacts are less than significant. In addition, the health risk assessment used a variety of non-standard methods that potentially result in underestimated impacts. Finally, the SCAQMD staff requests that additional mitigation measures be considered in the Final EIR to reduce any significant impacts should the lead agency, after further review, determine that project air quality or health effect impacts exceed the recommended significance thresholds.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final Environmental Impact Report. The SCAQMD staff is available to work with the Lead Agency to address these issues and any other air quality questions that may arise. Please

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contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,



Ian MacMillan
Program Supervisor, Inter-Governmental Review
Planning, Rule Development & Area Sources

Attachment

IM:GM

LAC130523-02
Control Number

Traffic Assumptions in the Air Quality Analysis

1. The trip generation values may not appropriately reflect a conservative air quality analysis under CEQA. For example, Tables 7 and 8 of Appendix 3.12-7 indicate that with a trip rate of 3.56 trips per 1,000 square feet of building area, a total of 1496 vehicles will visit the project sites each day. In the traffic and air quality analyses, only 20% of the vehicles are anticipated to be trucks. This means that approximately 1200 passenger vehicles will visit these sites each day, however only approximately 570 parking spaces are provided. This limited amount of passenger car parking indicates that the projected amount of passenger vehicle traffic may not actually be anticipated at these facilities. Given the goods movement purpose of this project, and the location of the site adjacent to the I-710 freeway and between the ports and Commerce rail yards, SCAQMD staff recommends that the air quality analysis consider a greater percentage of truck traffic. Consistent with guidance in Appendix E of the CalEEMod User Guide, the analysis should consider at least 40% of vehicles visiting this site should be heavy duty diesel trucks unless restrictions are placed on the project limiting truck traffic.
2. It is not clear how the total number of daily trips was calculated in Table 6 of Appendix 3.12-7. A footnote to this table indicates that the total daily trips were derived from measured peak hour trips, however the highly specialized existing land use may not follow typical traffic patterns. Further clarification should be provided regarding the existing traffic patterns and how the total number of daily trips was calculated.
3. The trip lengths used to determine regional air quality impacts used the air basin-wide default lengths provided in the CalEEMod model. These trip lengths are appropriate for passenger vehicle trips typically associated with residential or commercial development projects, however they may not be appropriate for trucks serving the specialized goods movement land use proposed for this project. Trucks accessing this site will likely travel to and from the ports of LA and Long Beach (approximately 15-20 miles away), and may travel to farther destinations in the basin. Some trucks may also travel short distances to nearby rail yards. The EIR should include additional clarification regarding truck trip lengths and should provide a reasonable worst case analysis when comparing potential emissions against SCAQMD thresholds.

Health Risk Assessment Methodology

4. The HRA methodology used for this project is inadequate to determine potential health risks from the proposed trucking activity. Several factors detailed below result in reported health risks that do not accurately reflect future activities. SCAQMD staff recommends that the lead agency provide a more robust analysis of health risk, including the use of AERMOD dispersion modeling, prior to determining the significance of this impact. The CEQA document should also contain a complete description of the health risk assessment calculations and methodology as this information was missing from the Draft EIR.

- a) The analysis only evaluated the idling of trucks and did not consider the movement of trucks on and around the site. SCAQMD staff recommends that the HRA include an analysis of all trucking activity from the project site up to the freeway entrances/exits that are used or to their ultimate destination if freeways are not used (e.g., travel to a nearby rail yard). This is especially important for this project as the primary truck routes will pass adjacent to an existing vocational school that serves high school age children and an onsite daycare.
- b) The analysis assumes that trucks will only idle for 5 minutes per visit to each facility. SCAQMD staff recommends that a more conservative 15 minutes be used for idling to account for multiple idling events per visit. For example, 5-minute idling may occur while queuing to enter the site, once at the dock, and another time upon exit.
- c) Several parameters in the calculation of health risk do not follow recommended OEHHA or SCAQMD guidance. The exposure duration for residential land uses should include 350 days per year over a period of 70 years. The assumption of only 87 days per year of exposure for schools does not appear reasonable. At a minimum for occupational uses, exposure duration should equal 240 days per year over a period of 40 years. High school age students and daycare age children also appear to use the facility and it is not clear that the HRA included their attendance in the exposure assumptions. Lastly, the 60 day exposure period for the transitional housing may not be appropriate if some residents have repeated stays.
- d) The distances specified in the SCREEN3 analysis do not appear to correspond to actual distances between the sources and receptors. For example, Parcel H is adjacent to the school site and is only 25 m from the transitional housing facility, but the closest modeled distance for this parcel is 150 m.
- e) The project site only includes approximately 100 loading docks that are supposed to accommodate approximately 300 trucks per day using the EIR's assumptions (see trip generation comments above). This volume of traffic compared to the limited truck parking indicates that there may be significant queuing of trucks as they access each site. The air quality impacts of this queuing activity (slower vehicle speeds, longer idling periods) should be considered in the air quality and health risk assessments.
- f) The air quality analysis and health risk assessment did not consider additional sources of pollution that sometimes are present at facilities such as those proposed. These sources include hostlers used to shuttle trailers onsite and between adjacent sites, Transportation Refrigeration Units (TRU's), and emergency generators. The analysis should include a discussion of the possibility of these sources onsite and should quantify emissions from them if they may be used. Further, given the potentially significant air quality impacts, mitigation should be included to reduce emissions from these sources. Specifically,

electrical outlets should be provided at docks to allow TRU's to plug in, hostlers should utilize non-diesel technologies, and emergency generators should use diesel traps (which also may be required per SCAQMD rules).

Mitigation Measures for Operational Air Quality Impacts (Mobile Sources)

5. Should the lead agency determine that results from the operational air quality analysis exceed the SCAQMD recommended daily significance thresholds, feasible and enforceable mitigation measures should be included in the Final EIR to reduce these impacts to below significant threshold levels. Since these impacts are primarily from mobile source emissions related to vehicle trips associated with the proposed project, the following related transportation mitigation measures are recommended, if applicable and feasible:

- Require the use of 2010 and newer diesel haul trucks (e.g., goods/materials delivery trucks) and if the lead agency determines that 2010 model year or newer diesel trucks cannot be obtained the lead agency shall use trucks that meet EPA 2007 model year NOx emissions requirements;
- Have truck routes clearly marked with trailblazer signs, so that trucks will not enter residential areas;
- Improve traffic flow by signal synchronization;
- Provide food options, fueling, truck repair and or convenience stores on-site to minimize the need for trucks to traverse through residential neighborhoods,
- Electrify service equipment at facilities (e.g., forklifts and yard hostlers). Where it is not feasible for equipment to be electrically powered the lead agency should ensure that it is not fueled by diesel, and
- Provide electric vehicle (EV) Charging Stations (see the discussion below regarding EV charging stations).

Electric Vehicle (EV) Charging Stations

6. Trucks that can operate at least partially on electricity have the ability to substantially reduce the significant NOX impacts from this project. Further, trucks that run at least partially on electricity are projected to become available during the life of the project as discussed in the 2012 Regional Transportation Plan and in the I-710 Draft EIR.¹ It is important to make this electrical infrastructure available when the project is built so that it is ready when this technology becomes commercially available. The cost of installing electrical charging equipment onsite is significantly cheaper if completed when the project is built compared to retrofitting an existing building. Therefore, the SCAQMD staff recommends the lead agency require each warehouse and other project areas that allow truck parking to be constructed with the appropriate infrastructure to facilitate sufficient electric charging for trucks to plug-in. Similar to the City of Los Angeles requirements for all new projects, the SCAQMD staff

¹ SCAG 2012 RTP, Chapter 7: <http://rtpscs.scag.ca.gov/Pages/2012-2035-RTP-SCS.aspx> ,
Caltrans District 7 – I-710 Draft EIR: <http://www.dot.ca.gov/dist07/resources/envdocs/docs/710corridor/> .

recommends that the lead agency require at least five percent of all vehicle parking spaces (including for trucks) include EV charging stations.² At a minimum, the electrical panels should be sufficiently sized to allow future upgrades and wiring should be provided to docks.

Mitigation Measures for Operational Air Quality Impacts (Other Area Sources)

7. In addition to the mobile source mitigation measures identified above the lead agency, the SCAQMD staff recommends the following onsite area source mitigation measures below be incorporated to reduce the project's overall significant regional air quality impacts from NOx emissions during operations. These mitigation measure should be incorporated pursuant to CEQA Guidelines §15126.4
 - a) 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.
 - b) Require all lighting fixtures, including signage, to be state-of-the art and energy efficient, and require that new traffic signals have light-emitting diode (LED) bulbs and require that light fixtures be energy efficient compact fluorescent and/or LED light bulbs. Where feasible use solar powered lighting.
 - c) Maximize the planting of trees in landscaping and parking lots.
 - d) Use light colored paving and roofing materials.
 - e) Use passive heating, natural cooling, solar hot water systems, and reduced pavement.
 - f) Utilize only Energy Star heating, cooling, and lighting devices, and appliances.
 - g) Install light colored "cool" roofs and cool pavements.
 - h) Limit the use of outdoor lighting to only that needed for safety and security purposes.
 - i) Require use of electric lawn mowers and leaf blowers.
 - j) Require use of electric or alternatively fueled sweepers with HEPA filters.
 - k) Use of water-based or low VOC cleaning products.

Air Quality Analysis

Construction

8. In the air quality analysis, the lead agency estimated project construction air quality impacts using the CalEEMod land use model, Version 2011.1.1, of which a revised version is imminently due for release. This model's current version uses default and user-defined settings to estimate emissions based on the expected land use and emission factors from the California Air Resources Board (CARB) OFFROAD2007 emission factors. Based on User Entered Comments, review of the inputs to the model's off-road equipment list, and footnotes to Table 3.1-6 on page 3.1-14 of the Draft EIR, the lead agency has modified the default settings for the load factor listed

² http://ladbs.org/LADBSWeb/LADBS_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf

for the types of off-road equipment selected reducing each default load factor by a factor of about one third, effectively lowering the emissions calculated from these emission sources by one third. This one-third reduction is based on an incorrect interpretation of CARB's conclusion that overall statewide emissions are reduced by one-third, but this recommendation, however, does not extend to project specific analysis. For example, the CalEEMod default load factor for a rubber tired dozer is 0.59; a tractor/loaders/backhoe has a load factor of 0.55; and a scraper is 0.72. In the air quality analysis, the lead agency used 0.40 as a load factor for rubber tired dozer; a load factor of 0.37 for a tractor/loaders/backhoe; and 0.48 for a scraper. These edits to load factors are not recommended by the SCAQMD staff without substantial evidence to support their use. If the lead agency would like to take credit for recent CARB Rulemaking, the newer OFFROAD 2011 model should be used³. The revised version of OFFROAD2011 will be incorporated in the newer version of CalEEMod. Otherwise, the lead agency should commit to enforcing the assumed lower emission factors or use the default load factors provided in CalEEMod.

³ OFFROAD 2011 shows that additional parameters affect emissions besides load factor, and that some equipment-specific emission factors can be either higher or lower than the OFFROAD 2007 emission factors used in CalEEMod. The release of the new version of CalEEMod that incorporates ARB's OFFROAD 2011 is imminent.