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Community Development Department
Planning Division
3900 Main Street, 3rd Floor
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Draft Mitigated Negative Declaration (DMND) for the Proposed Sycamore Canyon Boulevard Warehouse Development (Planning Case P14-1053 (DR) P14-1054 (PM))

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.

The Lead Agency proposes the subdivision of three parcels into five parcels in order to build five warehouse buildings totaling 230,420 square feet (approximately 205,420 square feet of warehouse uses and 25,000 square feet of office space) on a currently vacant 13.08 acre site. 329 surface parking spaces are planned along with about 324 loading docks for the five buildings. Construction is planned to start in 2015 and be completed in 2016, with the air quality land use modeling assuming a sixteen month construction period. The Lead Agency has estimated approximately 758 daily total vehicle trips including approximately 150 daily truck trips. Sensitive receptors are located north, abutting the proposed project site. Project truck traffic would mostly travel north along Sycamore Canyon Road passing residences located just west along this road to access two freeways: State Route 60 (SR-60) and State Route 215 (SR-215).

The Lead Agency has determined that regional and localized estimated construction, operation emissions and cancer risks are less than significant. In order to complete our review, however, the SCAQMD staff requested information supporting the health risk assessment (HRA) modeling from the Lead Agency on March 10, 2015. A follow-up e-mail and a phone call were made on March 12, 2015, but the SCAQMD staff has not yet received the requested supporting electronic input files. Since trucks will be operating on-site and past residences along one of the proposed truck routes, the SCAQMD staff believes it is important to review this supporting documentation prior to the certification of the Final CEQA document. Without the electronic files, the SCAQMD staff could not verify that receptors were properly placed to access any potential adverse health effect impacts.

Further, mitigation measures for construction are included in the DMND and the Air Quality, Greenhouse Gas, and Health Risk Assessment Impact Study (Air Quality Impact Study) but are not consistent, i.e., some measures appear in one and not the other. To avoid any misunderstanding, the measures should be consistent in the Final MND. Finally, should the Lead Agency determine that operational cancer risks are significant, the SCAQMD staff recommends that all feasible mitigation pursuant to Section 15126.4 of the CEQA Guidelines should be incorporated in the project and Final CEQA document. Further details are included in the attachment.

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final MND. The SCAQMD staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

Jillian Wong

Jillian Wong, Ph.D.
Program Supervisor
Planning, Rule Development & Area Sources

Attachment

JW:GM

RVC150304-03
Control Number

Air Quality Analysis - Operations

Vehicle Fleet Mixture Percentages

1. In the DMND, the air quality analysis used truck vehicle fleet mixture percentages from the City of Fontana Truck Trip Generation Study (Fontana Study) [1] to estimate project air quality operational impacts in the CalEEMod land use modeling. Specifically, the Fontana Study fleet mixture percentages include: 3.46 percent of the total fleet for 2-axle trucks; 4.64 percent for 3-axle trucks; and 12.33 percent for 4-axle and larger trucks with truck categories totaling 20.43 percent of the total vehicle fleet. Passenger Vehicles would therefore comprise 79.57 percent of total vehicles during operations. However, in the modeling inputs, the individual vehicle category percentages (2-axle – 0.007399, 3-axle – 0.012745. and 4-axle trucks 0.042494) totaled 6.74 percent, which is lower than the percentage of trucks in the Traffic Study[2]. In order to avoid underestimating project operational and related air quality and health effect impacts, the Final MND should be revised using the following truck percentages: LHD2 = 0.0645, MHD = 0.0865, HHD = 0.2300.

Construction Mitigation Measures

2. On page six of the DMND, the Lead Agency has included mitigation measures including dust control "as required by AQMD" alluding to measures in Rule 403 – Fugitive Dust. The Lead Agency is reminded that complying with a rule, regulation, law, etc., should not be considered as mitigation if it is required. Instead, the effects of complying with a rule, e.g., Rule 403 should be part of the project description and incorporated into the project-specific impact calculations. The specific measures from Rule 403 should be specifically stated in the Final MND.

   Lastly, to avoid confusion of someone reading measures found in the Air Quality Impact Study starting on page 6-3 that are not consistent with the measures listed starting on page six in the DMND. In the Final MND, the means proposed for implementation should be consistent throughout the document.

Mitigation Measures for Operational Air Quality Impacts (Mobile Sources)

3. The California Air Resources Board has classified the particulate portion of diesel exhaust emissions as carcinogenic. Should the Lead Agency determine that project health risk impacts during operation are significant, the SCAQMD staff recommends the following change in project measures that should be incorporated into the Final MND to reduce diesel particulate matter (DPM) exposure to sensitive receptors and reduce project air quality impacts, primarily emitted from trucks operating at the project site:

[1] Trip Generation and Trip Distribution Study, RK Engineering Group, Inc. December 2014), Table 4 – Passenger Car Equivalent Trip Generation Rates.
[2] Ibid, Footnote 4

Recommended Mitigation Measures:

- Require the use of 2010 compliant diesel trucks, or alternatively fueled, delivery trucks (e.g., food, retail and vendor supply delivery trucks) at commercial/retail sites upon project build-out. If this isn't feasible, consider other measures such as incentives, phase-in schedules for clean trucks, etc.

- Provide minimum buffer zone of 300 meters (approximately 1,000 feet) between truck traffic and sensitive receptors based on guidance from the California Air Resource Board (CARB) guidance.[3]

- Limit the daily number of trucks allowed at each facility to levels analyzed in the Final MND. If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the project through CEQA prior to allowing this higher activity level.
- Design the site such that any check-in point for trucks is well inside the facility to ensure that there are no trucks queuing outside of the facility.
- On-site equipment should be alternative fueled.
- Provide food options, fueling, truck repair and or convenience stores on-site to minimize the need for trucks to traverse through residential neighborhoods.
- Improve traffic flow by signal synchronization.
- Have truck routes clearly marked with trailblazer signs, so that trucks will not enter residential areas.
- In order to further reduce project emissions, the Lead Agency should consider mitigation that requires accelerated phase-in for non-diesel powered trucks. For example, natural gas trucks, including Class 8 HHD trucks, are commercially available today. Natural gas trucks can provide a substantial reduction in health risks, and may be more financially feasible today due to reduced fuel costs compared to diesel. In the Final CEQA document, the Lead Agency should include a phase-in schedule for these cleaner operating trucks to reduce project impacts. SCAQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency and project applicant.

  At a minimum, require upon occupancy, tenants or occupants that do not already operate 2007 and newer trucks to apply in good faith for funding to replace/retrofit their trucks, such as Carl Moyer, VIP, Prop 1B, or other similar funds. Should funds be awarded, the occupant should also be required to accept and use them.

[3] CARB: Air Quality and Land Use Handbook: A Community Health Perspective, April 2005, Page4 for Distribution Centers.

Electric Vehicle (EV) Charging Stations

4. 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. 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 the proposed facility and other plan 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 recommends that the Lead Agency require at least 5% of all vehicle parking spaces (including for trucks) include EV charging stations.[4] Further, electrical hookups should be provided at the onsite truck stop for truckers to plug in any onboard auxiliary equipment. At a minimum, electrical panels should appropriately sized to allow for future expanded use.

[4] http://ladbs.org/LADBSWeb/LADBS_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf