



# South Coast Air Quality Management District

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Community Development Department  
City of La Mirada  
13700 La Mirada Boulevard  
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## **Draft Mitigated Negative Declaration and Initial Study (Draft MND/IS) for the Proposed New Industrial Building – Certificate of Compatibility No. 36**

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 Mitigated Negative Declaration.

In the Draft Mitigated Negative Declaration's (Draft MND) project description, the lead agency proposes to demolish the existing 234,000 square foot industrial building and construct a new 273,578 square foot concrete tilt-up industrial warehouse building with a net increase in building space of 39,578 square feet on a 12.12 acre site. The proposed warehouse would include 44 truck-high loading docks, and for analysis purposes, the facility is assumed to operate 24-hours a day in three shifts, seven days a week. In addition, 51 spaces are planned for truck trailer parking and 210 parking stalls established for employee parking. Although references are made to emission estimate resources such as the California Emissions Estimate Land Use Model (CalEEMod), the SCAQMD CEQA Air Quality Handbook (Handbook), traffic forecast information supplied by Linscott, Law and Greenspan (2013), this supporting documentation used to demonstrate the lead agency's findings was not included in the circulated Draft CEQA document or sent to SCAQMD staff when requested to enable the SCAQMD staff review of these materials. On May 14, 2013 and May 21, 2013, SCAQMD staff requested supporting documentation by e-mail to the lead agency. To date, the requested supporting information has not been received by the SCAQMD staff.

The information requested included the CalEEMod modeling output sheets along with the associated Excel electronic modeling input files that the SCAQMD staff reviews to understand the modeling input assumptions. In addition, the traffic study information used to determine the projected traffic forecast were requested to assist in the review of project traffic impacts including the projected truck routes that could impact sensitive receptors, potential vehicle miles traveled, and how the vehicle fleet mixture was determined. Because this documentation was not provided with the circulated Draft MND/IS nor supplied to the SCAQMD staff upon request, neither our agency nor the

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2

June 7, 2013

public can confirm the Draft MND/IS contains substantial evidence to demonstrate the lead agency's determination that project long-term air quality impacts are less than significant. The SCAQMD further recommends that the aforementioned documentation be made available with the Final CEQA document so that the public, reviewing agencies, and other interested parties can adequately review the basis of these potential impacts.

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 air quality 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,



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

Attachment

IM:GM

LAC130418-01  
Control Number

## **Air Quality Analysis**

### **CalEEMod Output Sheets, Excel Input Files and Baseline Emissions**

1. In the Air Quality Section starting on page 3, the lead agency cites using the California Emissions Land Use Model (CalEEMod) to estimate project construction and operational impacts but did not include the modeling output sheets in the Draft MND/IS. In addition, the Excel electronic input modeling files should be supplied so that the CalEEMod modeling assumptions can also be evaluated. This documentation is needed to review the emission estimates shown in Table 3-2 (Estimated Construction Estimates) and Table 3-3 (Estimated Operational Emissions). Further, the lead agency has not explained whether the operational emission estimates in Table 3-3 include baseline emissions from the existing industrial facility that has 19 loading docks and includes truck activity. Should further review determine that project impacts exceed the SCAQMD recommended significance thresholds, the lead agency should incorporate mitigation to reduce impacts to less than significant levels.

### **Operational Emissions/Traffic and Circulation**

2. In Table 3-3 on page 38, the lead agency shows only general operation emission categories but does not break the emission sources down by specific source categories, e.g., Mobile Sources: on-road vehicle emissions, employee trips, on-site emissions (including emissions from vehicles entering and exiting the facility, moving about or idling at the loading docks), and emissions from service equipment. The potential emissions from these and other applicable sources are not accounted for in the air quality analysis and applicable tables in the Air Quality Section of the Draft MND/IS. In addition, since the lead agency has estimated that the proposed project will generate 975 daily trips in its Transportation and Circulation Section, this type of land use would likely include a large portion of heavy-heavy duty trucks and other diesel fueled vehicles in its fleet mixture operating from the site and traveling throughout the basin. Next, neither the Air Quality nor the Traffic & Circulation sections discusses the distances on-road equipment might travel throughout the basin. Since the facility tenants are not specified at this point, the most conservative estimates should include distances that on-site vehicles could travel within the basin, even to the basin boundaries, if applicable. Without knowing the vehicle miles traveled assumptions, the SCAQMD staff is unsure if regional operational emission estimates are potentially underestimated. Therefore, the lead agency should show all emission sources, include a vehicle fleet mixture and discuss the potential air quality impacts from vehicle miles traveled by project equipment throughout the basin in the Final MND. Otherwise, the lead agency has not provided substantial evidence to support its findings of less than significant operational and health effect impacts.

### **Localized Significance Thresholds**

3. Starting on page 38 of the Draft MND/IS and upon an aerial map inspection, the proposed project is located within a quarter mile of sensitive receptors (residential properties) north east of the proposed project site. Therefore, the SCAQMD requests that the lead agency evaluate localized air quality impacts to ensure that any nearby sensitive receptors are not adversely affected by construction or operational activities that are occurring in close proximity. SCAQMD guidance for performing a localized air quality analysis can be found on the SCAQMD website.<sup>1</sup>

### **Traffic Impact Analysis**

4. In the Transportation & Circulation Section starting on page 80, the lead agency has estimated vehicle trips for the proposed project using the Institute of Traffic Engineers (ITE) Guidelines trip rate of 3.56 trips per 1,000 square feet of floor area resulting in approximately 975 daily trips. Although the project traffic forecast compares the projected daily trips to the existing land use activity, the proposed project trips are not described in the analysis by vehicle type (axle, weight, etc.) to allow comparison of like vehicle trips and associated emissions with other analyses (CalEEMod land use modeling or health risk effects). Since the emission factors for different vehicle types, e.g., passenger, delivery trucks, heavy-heavy vehicle trucks, etc., are not the same, the vehicle fleet trips needs to be separated by vehicle type in order to review the emissions estimated in the lead agency's air quality and health effects estimates. In addition, truck routes were not included in the Draft MND/IS to see if trucks would pass by sensitive receptors. Finally, the traffic section does not discuss the distances the trucks might travel as a worst-case scenario. This is needed to establish the vehicle miles traveled estimates used in the air quality and health effects modeling estimates. Otherwise, it is not possible for a reviewer to determine if operational air quality and health effect impacts may be understated and potentially significant.

### **Health Risk Effects Analysis**

5. From the projected project traffic generation in the Transportation & Circulation Section, the proposed warehouse project could possibly generate significant diesel exhaust particulate emissions from the 975 daily trips estimated by the lead agency including an undetermined portion of which could be diesel fueled trucks traveling and idling in support of the proposed warehouse facility. Diesel emissions may also occur as the vehicles operate at the site and idle at the loading docks as they arrive and exit the loading docks. Because the California Air Resources Board has classified the particulate portion of diesel exhaust emissions as carcinogenic and if there is a substantial amount of heavy-duty diesel truck trips at this site, which will emit particulate emissions from trucks queuing and idling, an air toxic health risk analysis may be warranted. This is particularly relevant since the proposed project is

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<sup>1</sup> Localized Significance Threshold Guidance : <http://www.aqmd.gov/ceqa/handbook/LST/LST.html> .

within a quarter-mile of an existing residential homes that are located northeast of the proposed site.

The SCAQMD has developed a methodology for estimating cancer risks from mobile sources in a document entitled Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions. This document can be downloaded from AQMD's CEQA web pages at the following URL:

[http://www.aqmd.gov/ceqa/handbook/mobile\\_toxic/diesel\\_analysis.doc](http://www.aqmd.gov/ceqa/handbook/mobile_toxic/diesel_analysis.doc). The HRA Guidance document also contains a list of mitigation measures that can be used to mitigate diesel exhaust emissions. The SCAQMD recommends that the lead agency consider the following mitigation measures (See recommended measures below in comment #6) from the HRA Guidance document for incorporation into the proposed project and the Final MND, if applicable and feasible:

### **Operational Mitigation Measures**

6. Should the lead agency determine that regional air quality impacts from project operations will exceed recommended thresholds, the SCAQMD staff encourages the lead agency to develop a common set of measures that are enforceable and that reduce emissions to the maximum extent feasible. The SCAQMD staff notes that in order to meet air quality standards as required by 2023, NO<sub>x</sub> emissions must be reduced by approximately two thirds beyond existing rules and regulations with the largest source of NO<sub>x</sub> emissions in our basin being heavy duty trucks. Without meeting air quality standards, our region faces federally mandated sanctions, including possible loss of transportation funding.

AQMD staff therefore recommends that the lead agency consider the feasibility of the following measures to reduce project impacts. Other lead agencies that have used measures similar to these include the City of Banning,<sup>2</sup> Riverside County,<sup>3</sup> City of San Bernardino,<sup>4</sup> the San Pedro Bay Ports,<sup>5</sup> and the VIP Moreno Valley Warehouse Project,<sup>6</sup> among others.

Recommended measures:

- Lease/purchase documents shall identify that tenants are required to implement the following:
- At project start, all heavy duty trucks entering the property must meet or exceed 2010 engine emission standards specified in California Code of Regulations Title 13, Article 4.5, Chapter 1, Section 2025.

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<sup>2</sup> Banning Business Park

<http://banning.ca.us/archives/30/July%2013.%202010%20City%20Council%20Agenda.pdf>

<sup>3</sup> Mira Loma Commerce Center

[http://www.rctlma.org/online/content/conditions\\_of\\_approval.aspx?PERMITNO=pp17788](http://www.rctlma.org/online/content/conditions_of_approval.aspx?PERMITNO=pp17788)

<sup>4</sup> /Palm Industrial Distribution Center <http://www.ci.san-bernardino.ca.us/civica/filebank/blobdownload.asp?BlobID=11793>

<sup>5</sup> Clean Trucks Program <http://www.cleanairactionplan.org/cleantrucks/>

<sup>6</sup> VIP Moreno Valley Project Final EIR, Starting on page 71 (Suggested Mitigation Measures Incorporated by the Lead Agency) <http://www.moval.org/misc/vip-eir060420.shtml>.

- If the above clean truck requirements are infeasible, a phase-in schedule should be put forth that will feasibly achieve emission reductions as soon as possible, and faster than existing regulations. Should an alternative schedule be found necessary, the SCAQMD staff should be consulted prior to approving the schedule.
- Provide a phase-in schedule and goals for the introduction of zero or near-zero technology trucks (e.g., 10% by 2020, 20% by 2025, etc.) that visit warehouses.
- The facility operator will maintain a log of all trucks entering the facility to ensure that on average, the daily truck fleet meets the quantities and emission standards listed in the Draft EIR. This log should be available for inspection by city staff at any time.
- The facility operator will ensure that onsite staff in charge of keeping the daily log and monitoring for excess idling will be trained/certified in diesel health effects and technologies [for example, by requiring attendance at CARB approved courses (such as the free, one-day Course #512)].
- Limit the daily number of trucks allowed at each facility to levels analyzed in the Final EIR. 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.
- Require at least a portion of the fleet to utilize alternative fueled technologies.
- The 2012 Regional Transportation Plan includes a zero-near-zero emissions truck corridor along the SR-60 and I-710 freeways. Because at least a portion of the trucks serving this project may be expected to travel along these routes, the project should provide onsite alternative fueling infrastructure, such as electric charging stations or natural gas fueling that will help facilitate these low-emitting trucks.
- At a minimum, require tenants upon occupancy 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 tenant should also be required to accept and use them.
- Restrict overnight parking in residential areas. Establish overnight parking within the warehouse/distribution center where trucks can rest overnight.
- Establish area(s) within the facility for repair needs.
- Post signs outside of the facility providing a phone number where neighbors can call if there is a specific issue.
- Develop, adopt and enforce truck routes both in and out of city, and in and out of facilities.

- Have truck routes clearly marked with trailblazer signs, so trucks will not enter residential areas.
- Identify or develop secure locations outside of residential neighborhoods where truckers that live in the community can park their truck, such as a Park & Ride.
- Provide food options, fueling, truck repair and or convenience store on-site to minimize the need for trucks to traverse through residential neighborhoods.
- Requiring all on-site vehicles (hostlers, forklifts, etc.) to utilize zero or near-zero emission technology.
- Use street sweepers that comply with SCAQMD Rules 1186 and 1186.1.
- Install solar panels on all available roof space. If this isn't feasible, then at a minimum all buildings and electrical infrastructure should be designed to accommodate potential future solar panel upgrades.
- Ensure the site has adequate ability to handle large queue of trucks, including during peak delivery periods.
- The project should require that all tenants provide information and promote incentive programs and available alternative fueling truck technologies. This information should be updated as needed to ensure that the most recent information is available.