



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS

December 3, 2015

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Draft Environmental Impact Report (DEIR) for the Proposed Arcadia Logistics Center (SCH No. 2015041002)

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 development of an industrial park/logistics center on an approximately 81.27-acre site. The development includes six buildings totaling 1,688,000 square feet of building space with tenant types that are unknown at this point. Based on the projected project trip generation study¹, the proposed project could generate approximately 7,932 total daily trips including daily traffic from approximately 1,563 trucks.

In the Air Quality Section, the lead agency quantified the project's construction and operation air quality impacts and has compared those impacts with the SCAQMD's recommended regional and localized daily significance thresholds. Based on its analyses, the lead agency has determined that operational air quality impacts will exceed the recommended regional daily significance threshold for VOC and NOx, mostly from truck activities².

Since the proposed project will result in significant regional impacts during operations, the SCAQMD staff recommends that all feasible mitigation measures should be included in the Final CEQA document to further reduce the significant impact in accordance with Section 15126.4 of the CEQA Guidelines. Further details are included in the attachment.

¹ DEIR, Section 4.10 Transportation, Page 4.10-17, Table 4.10-11 (Proposed Project Trip Generation Summary (Actual Vehicles), Urban Crossroads, 2015e, Table 4-3).

² Ibid, Sec. 4.2 Air Quality, Page 4.2-51, Tables 4.2-18 and 4.2-19 (Urban Crossroads, 2015a, Tables 3-9 and 3-10).

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Pursuant to Public Resources Code Section 21092.5, SCAQMD staff requests that the lead agency provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. 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 the enclosed comments.

Sincerely,

Jillian Wong

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

Attachment

JW:GM

LAC151020-03
Control Number

Mitigation Measures for Operational Air Quality Impacts (Mobile Sources)

1. During project operations, the Lead Agency has determined that project operation emissions are significant for Volatile Organic Compounds (VOC) and Oxides of Nitrogen (NO_x), primarily from on-road mobile sources including truck activity emissions. The SCAQMD staff therefore recommends the following change and additional measures that should be incorporated into the Final EIR to reduce exposure to sensitive receptors and reduce project air quality impacts:

Additional Mitigation Measures:

- a) 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.
- b) 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) guidance³.
- c) 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.
- d) 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.
- e) Provide food options, fueling, truck repair and or convenience stores on-site to minimize the need for trucks to traverse through residential neighborhoods.
- f) Improve traffic flow by signal synchronization.
- g) Have truck routes clearly marked with trailblazer signs, so that trucks will not enter residential areas.
- h) Because the proposed Project generates significant regional emissions, the Lead Agency should require 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 require 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.
- i) At a minimum, require 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 occupant should also be required to accept and use them.

³ CARB: Air Quality and Land Use Handbook: A Community Health Perspective, April 2005, Page 4 for Distribution Centers.