



South Coast Air Quality Management District

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14177 Frederick Street
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Draft Environmental Impact Report (Draft EIR) for the Proposed Indian Street Commerce Center Project P16-003 (SCH NO. 2016031036)

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 EIR.

The Lead Agency proposes to develop an approximately 19.64-acre site for approximate 446,350 square feet of warehouse distribution and light industrial uses including 347,080 square feet of warehouse use; 89,270 square feet of manufacturing use; and 10,000 square feet allocated for offices uses. Parking for both buildings totals 589 parking stalls, 342 trailers spaces and a total of 196 loading dock doors. The proposed project is expected to generate approximately 940 total daily trips including 360 daily trucks.¹ Construction is expected to begin in January 2017 and be completed, based on market conditions, in August 2018.

The Lead Agency has determined that operating emissions primarily from mobile sources will exceed the SCAQMD recommended regional significance threshold for Oxides of Nitrogen (NO_x). The SCAQMD staff therefore recommends additional measures to reduce the mobile source impacts during operations. Details are included in the attachment.

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.

¹ DEIR, Appendix B - Traffic Impact Analysis (Urban Crossroads, June 29, 2016), Page 58, Table 4-3, Project Trip Generation (Actual Vehicles).

Sincerely,

Jillian Wong

Jillian Wong, Ph.D.
Planning and Rules Manager
Planning, Rule Development & Area Sources

Attachment

JW:GM

RVC160830-10
Control Number

Mitigation Measures for Operational Air Quality Impacts (Mobile Sources)

1. Since the proposed project will exceed the recommended SCAQMD significance threshold for NO_x during operations, mainly from mobile sources, the SCAQMD staff recommends the following additional mitigation measures to further reduce those significant project impacts:

Recommended Additions:

- a) Limit the daily number of trucks allowed at the 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.
- b) 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. Other measures such as incentives, phase-in schedules for clean trucks, etc., should also be considered.
- c) Because the proposed Project generates significant regional emissions, the Lead Agency should require mitigation that requires accelerated phase-in of the cleanest truck technologies that are available. For example, natural gas trucks, certified below the current emissions standards can provide a substantial reduction in emissions and therefore a 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.
- d) 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.
- e) 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) shall include EV charging stations² to encourage the use of low or zero-emission vehicles. Prior to building permit issuance, the City shall verify building plans contain electric charging stations.

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

- f) 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.
- g) Have truck routes clearly marked with trailblazer signs, so trucks will not enter residential areas or restricted routes.
- h) Provide food options, fueling, truck repair and or convenience stores on-site to minimize the need for trucks to traverse through residential neighborhoods.
- i) Improve traffic flow by signal synchronization.