South Coast
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Draft Environmental Impact Report (Draft EIR) for the Proposed Alliance California Gateway South Building 4 Project ("Proposed Project")

The South Coast Air Quality Management District (SCAQMD) staff 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.

SCAQMD's 2016 Air Quality Management Plan

On March 3, 2017, the SCAQMD's Governing Board adopted the 2016 Air Quality Management Plan (2016 AQMP), which was later approved by the California Air Resources Board of Directors on March 23rd. The 2016 AQMP[1] is a regional blueprint for achieving air quality standards and healthful air in the South Coast Air Basin (Basin). Built upon the progress in implementing the 2007 and 2012 AQMPs, the 2016 AQMP provides a regional perspective on air quality and lays out the challenges facing the Basin. The most significant air quality challenge in the Basin is to reduce an additional 45 percent reduction in NOx emissions in 2023 and an additional 55 percent reduction in NOx emissions beyond 2031 levels for ozone attainment.

Project Description

The Lead Agency proposes to construct and operate one high-cube warehouse totaling 1,063,852 square feet (sf) on 62.02 acres ("Proposed Project"). The Proposed Project is surrounded by commercial and residential land uses to the north, commercial uses to the east, and public space to the south and west. Construction is expected to occur in one phase over one year starting in 2017[2].

Air Quality and Health Risk Assessment (HRA) Analyses

In the Air Quality Section, the Lead Agency quantified the Proposed Project's construction and operation emissions and compared them to SCAQMD's regional and localized air quality CEQA significance thresholds. The air quality analysis was based on approximately 1,789 total vehicle trips, including 682 daily diesel truck trips[3]. The Lead Agency found that regional operational NOx emissions are significant and unavoidable after incorporating mitigation measures (MM) AQ 2 through MM AQ 5. Additionally, the Lead Agency performed a HRA and found that the Maximum Exposed Individual Resident cancer risk would be 1.45 in one million which is below SCAQMD's CEQA significance threshold of 10 in one million for cancer risk[4].

SCAQMD staff has concerns about the air quality and HRA analyses in the Draft EIR. The HRA analysis used assumptions which have likely led to an under-estimation of the Proposed Project's health risk

[1] South Coast Air Quality Management District. March 3, 2017. *2016 Air Quality Management Plan*. Available at: http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan.
[2] Draft EIR. Section 3.4, *Construction Duration*. Page 3-8.
[3] Appendix J1, *Traffic Impact Analysis*. Table 1 – Project Trip Generation Summary.
[4] Draft EIR. Section 4.2, *Air Quality*. Page 4.2-25.

impacts. Details are included in the attachment. Additionally, as described above, achieving NOx emission reductions in a timely manner is critical to attaining the National Ambient Air Quality Standard (NAAQS) for ozone before the 2023 and 2031 deadlines. SCAQMD is committed to attain the ozone NAAQS as expeditiously as practicable. Therefore, SCAQMD staff recommends an additional mitigation measure to further reduce the significant operational NOx emissions. Please see the attachment for more information.

Pursuant to the California Public Resources Code Section 21092.5 and the CEQA Guidelines Section 15088, SCAQMD staff requests that the Lead Agency provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final EIR.

SCAQMD staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Jack Cheng, Air Quality Specialist, CEQA IGR Section, at (909) 396-2448, if you have any questions regarding the enclosed comments.

Sincerely,

Lijin Sun

Lijin Sun, J.D.
Program Supervisor, CEQA IGR
Planning, Rule Development & Area Sources

Attachment
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SBC170615-04
Control Number

ATTACHMENT

Air Quality and Health Risk Assessment (HRA) Analyses

1. In the HRA, the Lead Agency averaged the DPM emissions for the 70-year of exposure and used that emission rate to estimate health risks. The most recent 2015 revised Office of Environmental Health Hazard Assessment (OEHHA) Guidance[5] acknowledges that children are more susceptible to the exposure to air toxics and have revised the way cancer risks are estimated to take this into account. Since the emissions from the Proposed Project-generated trucks get cleaner with time due to existing regulations and technologies, it would not be appropriate to average out the emissions over the 70-year exposure duration since this would underestimate the health risks to children who would be exposed to higher DPM concentrations during the early years of project operation. Therefore, SCAQMD staff recommends that the DPM emissions for each year of operation be applied to each of the corresponding age bins (i.e. emissions from Year 1 of project operation should be used to estimate cancer risks to the third trimester to 0 year age bin; Year 1 and 2 of project operation should be used to estimate the cancer risks to the 0 to 2 years age bins; and so on).

2. On March 6, 2015, OEHHA adopted the revised Guidance for performing a HRA[6]. The Lead Agency prepared and publicly circulated a Notice of Preparation for the Proposed Project on February 9, 2017[7]. Based on a review of the Appendix B2 – Mobile Source Health Risk Assessment[8], SCAQMD staff found that the Lead Agency performed a HRA for the Proposed Project on March 27, 2017. The 2015 revised OEHHA Guidance is the most recent version and was available at the time of analysis. Therefore, SCAQMD staff recommends that the Lead Agency use the 2015 revised OEHHA Guidance to revise the HRA analysis.

3. The HRA analysis involved the use of separate discrete receptors placed randomly. SCAQMD staff recommends that the Lead Agency revise the HRA and use a receptor grid of no more than 100-meter spacing over the existing residences and areas zoned or planned for residential development in order to ensure that the maximum potential health impacts are properly analyzed and disclosed in the Final EIR.

4. Receptor locations should be placed at the boundaries of the residential property and not the residential structure since residents have the potential to spend time outdoors (recreation, dining, etc.). Placing receptors on the residential structure will likely underestimate cancer risks to the residents. Therefore, SCAQMD staff recommends that the Lead Agency revise the model and start the grid at the property boundaries to ensure potential maximum concentrations are identified.

Siting Warehouses Near Residences

5. Based on a review of the project description and aerial photographs, SCAQMD staff found that the nearest sensitive receptor is approximately 500 feet south of the Proposed Project. While SCAQMD staff recognizes that there are many factors Lead Agencies must consider when making local planning and land use decisions, there are concerns about the proximity of a

[5] Office of Environmental Health Hazard Assessment. March 6, 2016. *Air Toxics Hot Spots Program Guidance Manual for the Preparation of Health Risk Assessments 2015*. Available at: https://oehha.ca.gov/air/crnr/notice-adoption-air-toxics-hot-spots-program-guidance-manual-preparation-health-risk-0.
[6] *Ibid.*
[7] Appendix A, *Initial Study, Notice of Preparation, and Written Comments on the NOP*. Page 2.
[8] Appendix B2, *Mobile Source Health Risk Assessment*. Section 2.1 – AERMOD Output Files.

warehouse to the existing residences and the potential long-term air quality impacts to the people living near the warehouse and along the truck routes as a result of increased truck activities. SCAQMD staff recommends that the Lead Agency use the California Air Resources Board's (CARB) Air Quality and Land Use Handbook as a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land-use decision making process. In the CARB's Air Quality and Land Use Handbook, CARB recommends a buffer of at least 1,000 feet between distribution centers that accommodate more than 100 trucks per day and a buffer of 500 feet from high-traffic urban roadways [9].

Additional Mitigation Measure for Operational Air Quality Impacts (Mobile Sources)

6. CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant impacts. To further reduce the significant operational NOx emissions from the Proposed Project, SCAQMD staff recommends incorporating the following on-road mobile-source truck related mitigation measure in the Final EIR. For more information on potential mitigation measures as guidance to the Lead Agency, please visit SCAQMD's CEQA Air Quality Handbook website[10].

   a. **MM AQ 6:** Require the use of 2010 and newer haul trucks (e.g., material delivery trucks and soil import/export). In the event that that 2010 model year or newer diesel haul trucks cannot be obtained, provide documentation as information becomes available and use trucks that meet EPA 2007 model year NOx emissions requirements[1], at a minimum. Additionally, consider other measures such as incentives, phase-in schedules for clean trucks, etc."

[9] California Air Resources Board. 2005. Air Quality and Land Use Handbook. Accessed at: http://www.arb.ca.gov/ch/handbook.pdf. Guidance is for siting new sensitive land uses within 1,000 feet of a distribution center (Page 4). The buffer is a neutral mitigation measure provided to minimize truck activity emission impacts to sensitive receptors. Besides truck activity of more than 100 trucks per day, this guidance applies to distribution centers that accommodate more than 40 transport refrigeration units per day or where TRU operations will exceed 300 hours per week truck activities and sensitive receptors (Page 4).

[10] South Coast Air Quality Management District. http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook.