



South Coast Air Quality Management District

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SENT VIA USPS AND E-MAIL:

November 9, 2017

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Mitigated Negative Declaration (MND) for the Proposed Cedar Avenue Technology Center

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 MND.

The Lead Agency proposes to construct and operate an 184,770 square-foot (sf) warehouse with unknown occupants on an approximately 9.8-acre site (Proposed Project). The MND estimates approximately 863 total vehicle trips, including approximately 135 daily diesel truck trips¹. In the Air Quality Section, the Lead Agency quantified the Proposed Project's construction and operational emissions and compared those emissions to SCAQMD's recommended regional and localized air quality CEQA daily significance thresholds. The Lead Agency found that localized and regional daily construction and operational air quality impacts are less than significant. The Lead Agency also conducted a health risk assessment (HRA) and found that the Maximum Exposed Individual Resident cancer risk would be 8.93 in one million which is below SCAQMD's CEQA significance threshold of 10 in one million for cancer risk².

SCAQMD staff has concerns about air quality and HRA analyses in the MND. Details are included in the attachment. After revising the air quality and HRA analyses, should the Lead Agency find that Proposed Project's air quality impacts will exceed SCAQMD's recommended air quality CEQA significance thresholds, the identification and evaluation of feasible mitigation measures to reduce impacts below the level of significance are required before the consideration of the MND for adoption pursuant to CEQA Guideline Section 15074(b). Additionally, SCAQMD staff has included a list of mitigation measures in the attachment to assist the Lead Agency in identifying feasible mitigation measures which have the potential to substantially lessen significant adverse air quality effects as stated in Public Resources Code Section 21002. In an event that the Lead Agency finds that significant adverse air quality impacts cannot be mitigated or avoided, a draft environmental impact report shall be prepared pursuant to CEQA Guideline Sections 15073.5, 15086, and 15087.

¹ MND, Page 77.

² MND, Page 24.

Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process. SCAQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Jack Cheng, Air Quality Specialist, CEQA IGR Section, at (909) 396-2448, if you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment

LS:JC

SBC171025-02

Control Number

ATTACHMENT

General Comments

1. On October 26, 2017 SCAQMD requested all technical air quality modeling, health risk assessment, and emission estimate files. The Lead Agency provided partial files on November 1, 2017. On November 2, 2017, SCAQMD staff made another attempt to obtain the health risk assessment and emission estimate calculations. Without these files, SCAQMD staff was unable to thoroughly review the air quality analysis and health risk assessment. SCAQMD staff recommends providing the requested files and allowing for additional time for review.

Air Quality Analysis

2. Table XVI-2 Trip Generation Rates³ states that heavy duty trucks account for 20.43% of the vehicle type. However, in the Air Quality Analysis – Appendix A, the Lead Agency used 10.2% heavy duty truck fleet mix to quantify operational emissions⁴. By using a 10.2% heavy duty truck fleet mix instead of 20.43%, the Lead Agency has likely underestimated the Proposed Project's operational air quality impacts. SCAQMD staff recommends that the Lead Agency use a fleet mix consistent throughout the MND to recalculate the Proposed Project's operational emissions.

Health Risk Assessment (HRA) Analysis

In the HRA, the Lead Agency used the AERMOD dispersion model to estimate DPM concentrations from the diesel vehicles generated by the Proposed Project and used the 2015 revised Office of Environmental Health Hazard Assessment (OEHHA) Guidelines to estimate potential health risks to sensitive receptors in the Project vicinity. SCAQMD staff recommends that the Lead Agency revise the HRA based on the following comments, which are intended to assist the Lead Agency in assessing the potential cancer risk attributable to the Proposed Project.

3. The 2015 revised OEHHA Guidelines acknowledge 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, it would not be appropriate to average out the emissions over the 30-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).

³ MND, Page 77.

⁴ Air Quality Impact Analysis, Appendix A, Page 66.

4. In the air dispersion modeling – Terrain Height Option, the Lead Agency used the Non-Default Regulatory Option “Flat”. SCAQMD staff recommends using the Default Regulatory Option “Elevated” or provide additional justification for the use of Non-Default Regulatory Flat Option. The use of National Elevation Dataset (NED) 1 arc-second or DEM 7.5 minute terrain data is recommended if using the “Elevated” setting.
5. On-site idling was modeled as a single area source. SCAQMD staff recommends that the Lead Agency use a series of volume source that spans the entire docking area to ensure that potential maximum concentrations are identified.
6. On-site idling emissions should include 15 minutes of idling to ensure that impacts are properly analyzed. The 15-minute idling includes the emissions generated when entering the proposed project site while heading towards the dock area; idling at the dock; and the emissions generated when leaving the docks while departing from the proposed project. Without the emission estimate calculation files, SCAQMD staff was unable to verify idling times or emission rates.
7. The HRA analysis involved the use of a 50-meter spacing receptor grid placed over existing sensitive receptors. Discrete receptor locations should also be placed at the boundaries of the sensitive receptors and not the residential structures. Placing receptors on the residential structures underestimates cancer risks to the residents. SCAQMD staff recommends that the Lead Agency revise the HRA and start the grid at the property boundaries to ensure potential maximum concentrations are identified.
8. The Lead Agency used AERMOD (version 15181) to prepare the dispersion modeling for the HRA. AERMOD (version 16216) was the most recent version available at the time of the analysis (10/27/2016). Therefore, SCAQMD staff recommends that the Lead Agency revise the dispersion modeling for the HRA by using AERMOD (version 16216r) in the Final MND.

Recommended Mitigation Measures for Operational Air Quality Impacts (Mobile Sources)

9. CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse impacts. In the event that the Lead Agency, after revising the HRA analysis based on the comments provided above, finds that the Proposed Project would result in significant health risk impacts, SCAQMD staff recommends incorporating the following on-road mobile-source truck related mitigation measures in the Final MND. For more information on potential mitigation measures as guidance to the Lead Agency, please visit SCAQMD’s CEQA Air Quality Handbook website⁵.
 - a. 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

⁵ South Coast Air Quality Management District. <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.

- trucks that meet EPA 2007 model year NOx emissions requirements⁶, at a minimum. Additionally, consider other measures such as incentives, phase-in schedules for clean trucks, etc.
- b. Have truck routes clearly marked with trailblazer signs, so that trucks will not enter residential areas.
 - c. Develop, adopt and enforce truck routes in and out of facilities.
 - d. Limit the daily number of trucks allowed at the facility to levels analyzed in the Final MND (135 trucks per day as analyzed in the 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 land use or higher activity level.
 - e. Provide electric vehicle (EV) Charging Stations (see the discussion below under “f.” regarding EV charging stations).
 - f. Should the Proposed Project generate 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 MND, 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.
 - g. 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 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy⁷. 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, SCAQMD staff recommends the Lead Agency require the proposed warehouse 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, SCAQMD staff recommends that the Lead Agency require at least 5% of all vehicle parking spaces (including for trucks) include EV charging stations.⁸ 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.

⁶ Based on a review of the California Air Resources Board’s diesel truck regulations, 2010 model year diesel haul trucks should have already been available and can be obtained in a successful manner for the project construction California Air Resources Board. March 2016. Available at: <http://www.truckload.org/tca/files/ccLibraryFiles/Filename/000000003422/California-Clean-Truck-and-Trailer-Update.pdf> (See slide #23).

⁷ Southern California Association of Governments. Adopted April 7, 2016. Available at: <http://scagtrpccs.net/Pages/default.aspx>.

⁸ City of Los Angeles. March 30, 2017. Accessed at: http://ladbs.org/LADBSWeb/LADBS_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf.

- h. Create a buffer zone of at least 300 meters (roughly 1,000 feet), which can be office space, employee parking, greenbelt, etc. between the warehouse/distribution center and sensitive receptors.
- i. Design the warehouse/distribution center such that entrances and exits are such that trucks are not traversing past neighbors or other sensitive receptors.
- j. Design the warehouse/distribution center such that any check-in point for trucks is well inside the Proposed Project to ensure that there are no trucks queuing outside of the facility boundaries.
- k. Design the warehouse/distribution center to ensure that truck traffic within the Proposed Project is located away from the property line(s) closest to residences or sensitive receptors.
- l. Restrict overnight parking in residential areas.
- m. Establish overnight parking within the warehouse/distribution center where trucks can rest overnight.
- n. Establish designated area(s) within the Proposed Project for repair needs away from residences or sensitive receptors.