



South Coast Air Quality Management District

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SENT VIA USPS AND E-MAIL:

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Mitigated Negative Declaration (MND) for the Proposed IPT Arrow Route DC Project (DRC2016-00726)

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.

Project Description

The Lead Agency proposes to construct and operate a 611,573-square-foot, high-cube warehouse with unknown occupants on an approximately 26.63-acre site (“proposed project”). The proposed project is bounded by commercial uses to the north, east, south, and west.

Air Quality and Health Risk Assessment (HRA) Analyses

In the Air Quality Section, the Lead Agency quantified the proposed project’s construction and operational emissions and compared them to SCAQMD’s regional and localized air quality CEQA significance thresholds. The air quality analysis was based on approximately 824 total vehicle trips, including 212 daily truck trips¹. The Lead Agency found that regional and localized construction and operational emissions would be less than significant. Additionally, the Lead Agency performed a HRA and found that the Maximum Exposed Individual Resident cancer risk would be 0.23 in one million, which is below SCAQMD’s CEQA significance threshold of 10 in one million for cancer risk².

SCAQMD staff has concerns about the HRA analysis in the MND. The analysis utilized assumptions which have likely led to an under-estimation of the proposed project’s health risk impacts. Details are included in the attachment. After revising the HRA analysis, should the Lead Agency find that the proposed project’s health impacts would exceed SCAQMD’s CEQA significance thresholds, mitigation measures are required pursuant to the CEQA Guideline Section 15074(b). 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 such significant effects (Public Resources Code Section 21002).

Pursuant to the 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. Please provide SCAQMD staff with written responses to all comments contained herein prior to the adoption of the Final MND.

¹ IPT Arrow Route DC Project. Initial Study and Mitigated Negative Declaration – Table 14 Project Trip Generation Summary.

² *Ibid.* Page 3-20.

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

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment

LS:JC

SBC170621-02

Control Number

ATTACHMENT

Daily Truck Trip Rate

1. In the air quality analysis, the Lead Agency used the Institute of Transportation Engineers Trip Generation Manual, 9th Edition, 2012 (ITE Manual) 1.68 overall trip generation rate (for cars and trucks totaling approximately 824 daily vehicles) , and did not use the 0.64 (38.1%) daily truck trip rate from this same reference. Rather, the Trip Generation Rates used a passenger vehicle trip rate of 1.337 vehicles per day and a daily truck trip rate of 0.343 daily truck trip rate (1.68 total daily trip rate minus 1.337 passenger vehicle trip rate or 20.43% daily truck trip rate). Additionally, truck vehicle fleet mixture percentages from the City of Fontana Truck Trip Generation Study (Fontana Study) was used to estimate project air quality operational impacts in the CalEEMod modeling. By using the 0.343 daily truck trip rate, trucks are estimated at 212 daily truck trips in the MND instead of approximately 395 daily truck trips using the ITE 0.64 daily truck trip rate. Therefore, absent from a specific traffic study of known tenants, the Final MND should be consistent using the associated ITE truck trip rate to estimate daily truck trips so that the proposed project's truck trips and associated emissions and health impacts are not underestimated.
2. The total vehicle mixture in Appendix 3.1 – CalEEMod Emissions Model Output was not consistent with the traffic analysis³. In Appendix 3.1 – CalEEMod Emissions Model Output – Section 4.3 Trip Type Information, heavy duty trucks accounted for 12% of the total trips while the traffic study appropriated 20.43% of total trips to heavy duty trucks. SCAQMD staff recommends using the ITE truck trip rate of 0.64 trips/tsf (38.1% of total vehicle trips) to estimate daily truck trips so that the proposed project's truck trips, emissions, and health impacts are not underestimated.
3. Additionally, the heavy duty fleet mixture in Appendix 3.1 was not consistent with the heavy duty truck fleet mixture in the traffic study and the HRA⁴, which may have underestimated the proposed project's operational emissions. Appendix 3.1 included a heavy duty truck fleet mixture of LHD = 54%, MHD = 14%, HHD = 32%, while the traffic study and HRA used a heavy duty truck fleet mixture of LHD = 17%, MHD = 23%, HHD = 60%. Therefore, SCAQMD staff recommends that the Lead Agency correct the inconsistencies and use the ITE 0.64 daily truck trip rate and a heavy truck fleet mixture of LHD2 = 0.0645, MHD = 0.0865, HHD = 0.2300 consistently throughout the Final MND and technical appendices.

Health Risk Assessment (HRA) Analysis

4. Based on a review of the HRA analysis, SCAQMD found that the HRA analysis utilized the 2015 revised OEHHA guidelines to estimate the health risks to sensitive receptors in the proposed project's vicinity and that the AERMOD dispersion model was used to estimate diesel particulate matter (DPM) concentrations. SCAQMD staff recommends that the Lead Agency revise the HRA analysis based on the following comments.
 - a. 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 project-generated trucks get cleaner with time due to existing regulations, 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

³ *Ibid.* Table 14 Project Trip Generation Summary.

⁴ *Ibid.* Modeling File – “10360-02 HRA Truck Emissions Average.xlsx.”

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).

- b. The HRA analysis involved the use of a discrete receptor placed over existing residential structures. Receptor locations should be placed at the boundaries of the residential property and not the residential structures. Placing receptors on the residential structure underestimates cancer risks to the residents. SCAQMD staff recommends that the Lead Agency revise the HRA and use a receptor grid that starts at the property boundaries to ensure potential maximum concentrations are identified.

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

5. CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant 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.
 - 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 requirements⁶, at a minimum. Additionally, consider other measures such as incentives, phase-in schedules for clean trucks, etc.
 - Have truck routes clearly marked with trailblazer signs, so that trucks will not enter residential areas.
 - Limit activities to the amounts analyzed in the Final MND.
 - Promote clean truck incentive programs (see the discussion above regarding Cleaner Operating Truck Incentive Programs).
 - Provide electric vehicle (EV) Charging Stations (see the discussion below regarding EV charging stations).
 - 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 that the Lead Agency require the proposed project include 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

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

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://scagrtpscsc.net/Pages/default.aspx>.

at least 5% of all vehicle parking spaces (including for trucks) include EV charging stations⁸. 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.

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