



# South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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**Draft Environmental Impact Report (EIR) for the Proposed  
Brodiaea Commerce Center (Plot Plan PEN17-0143, Change of Zone PEN17-0144)  
(SCH No.: 2017111042)**

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 Staff's Summary of Project Description

The Lead Agency proposes to build a 261,807-square-foot warehouse with unknown tenants on approximately 11.8 acres (Proposed Project). The Proposed Project is expected to generate 168 daily truck trips<sup>1</sup>. Construction is expected to take approximately 13 months to complete<sup>2</sup>.

SCAQMD Staff's Summary of the Air Quality and Health Risk Assessment (HRA) Analyses

In the Air Quality Analysis, 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. After incorporating Mitigation Measures (MMs) 4.2-1 through 4.2-10, the Lead Agency found that the Proposed Project's construction air quality impacts would be less than significant. Additionally, the Lead Agency concluded that the Proposed Project would result in significant and unavoidable long-term impacts from NO<sub>x</sub> emissions. Because "no other mitigation measures are available that are feasible for the Project Applicant to implement and the City of Moreno Valley to enforce that have a proportional nexus to the Project's level of impact<sup>3</sup>," the Lead Agency did not include any mitigation measures to reduce operational NO<sub>x</sub> emissions. Furthermore, the Lead Agency conducted a health risk assessment (HRA) based on the 2015 Office of Environmental Health Hazard Assessment (OEHHA) Guidelines and found that the Proposed Project's maximum incremental cancer risk for residential exposure to diesel particulate matter (DPM) emissions would be 1.77 in a million<sup>4</sup>, which is below SCAQMD's CEQA significance threshold of 10 in one million for cancer risk.

SCAQMD Staff's Comments – Mitigation Measures

*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)<sup>5</sup>, which was later approved by the California Air Resources Board of Directors on March 23<sup>rd</sup>. Built upon the progress in implementing the 2007 and 2012 AQMPs, the 2016 AQMP provides a regional perspective on air quality and the challenges facing the South Coast Air Basin. The most significant air quality challenge in the Basin is to achieve an additional 45 percent reduction in nitrogen

<sup>1</sup> Draft EIR. Page 3-16.

<sup>2</sup> Draft EIR. Page 3-13.

<sup>3</sup> Draft EIR. Page 4.2-28.

<sup>4</sup> Draft EIR. Pages 4.2.-22.

<sup>5</sup> South Coast Air Quality Management District. March 3, 2017. *2016 Air Quality Management Plan*. Accessed at: <http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan>.

oxide (NO<sub>x</sub>) emissions in 2023 and an additional 55 percent NO<sub>x</sub> reduction beyond 2031 levels for ozone attainment.

Achieving NO<sub>x</sub> 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. The Proposed Project plays an important role in supporting the SCAQMD's commitment. Therefore, SCAQMD staff recommends additional mitigation measures to further reduce the significant operational NO<sub>x</sub> emissions.

#### *Diesel Haul Trucks of Model Year 2010 or Newer*

Since the Proposed Project's operational NO<sub>x</sub> emissions would exceed SCAQMD air quality CEQA significance threshold, the EIR is required to describe feasible mitigation measures which could minimize significant adverse impacts (CEQA Guidelines Section 15126.4). SCAQMD staff recommends that the Lead Agency use its best efforts to formulate mitigation measures to reduce the significant adverse NO<sub>x</sub> impacts during operation to the maximum extent feasible. Pursuant to the California Air Resources Board's (CARB) Truck and Bus Regulation, trucks with a gross vehicle weight rating greater than 26,000 pounds need to have 2010 model year engines or equivalent emissions by January 1, 2023<sup>6</sup>. Since the Proposed Project is assumed to be operational in 2019, SCAQMD staff recommends that the Lead Agency provide incentives to encourage future tenants to use 2010 model year diesel haul trucks or newer during operation. If the Lead Agency determines that 2010 model year or newer diesel haul trucks are not feasible, the Lead Agency should provide incentives to encourage future tenants to use trucks that meet EPA 2007 model year NO<sub>x</sub> emissions requirements. At a minimum, the Lead Agency should develop a schedule to phase in cleaner trucks that is consistent with the CARB's Truck and Bus Regulation timeline and supports the air quality attainment goals and timelines of the 2016 AQMP; otherwise, the Proposed Project, due to the unavoidable exceedance of NO<sub>x</sub> emissions during operation, should not be deemed consistent with the 2016 AQMP (*Threshold a*)<sup>7</sup>. SCAQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency.

#### *Additional Mitigation Measures for Operational Air Quality Impacts from Mobile Sources*

- Have truck routes clearly marked with trailblazer signs, so that trucks will not enter residential areas.
- Limit the daily number of trucks allowed at the Proposed Project to levels analyzed in the CEQA document (168 truck trips per day). If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the Proposed Project through CEQA prior to allowing this land use or higher activity level.
- 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 NO<sub>x</sub> 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 Strategy (2016-2040 RTP/SCS)<sup>8</sup>. 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 Project 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

<sup>6</sup> California Air Resources Board. December 18, 2017. *Truck and Bus Regulation Compliance Requirement Overview*. Accessed at: <https://www.arb.ca.gov/msprog/onrdiesel/documents/FSRegSum.pdf>.

<sup>7</sup> Draft EIR. Pages 4.2-18 and 19.

<sup>8</sup> Southern California Association of Governments. Accessed at: <http://scagrtpscsc.net/Pages/FINAL2016RTPSCS.aspx>.

at least 5% of all vehicle parking spaces (including for trucks) include EV charging stations<sup>9</sup>. 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.

- Design the industrial building such that trucks are not traversing or travelling past neighbors or other sensitive receptors.
- Design the industrial building such that any check-in point for trucks is well inside the Proposed Project site to ensure that there are no trucks queuing outside of the facility.
- Restrict overnight parking in residential areas.
- Establish overnight parking within the industrial building where trucks can rest overnight.
- Establish area(s) within the Proposed Project site for repair needs.

*Additional Mitigation Measures for Operational Air Quality Impacts from Air Sources*

- Maximize the planting of trees in landscaping and parking lots.
- Use light colored paving and roofing materials.
- Install light colored “cool” roofs and cool pavements.
- Require use of electric or alternatively fueled sweepers with HEPA filters.
- Use of water-based or low VOC cleaning products.

Closing

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), SCAQMD staff requests that the Lead Agency provide SCAQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful or useful to decision makers and to the public who are interested in the Proposed Project.

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 me at [lsun@aqmd.gov](mailto:lsun@aqmd.gov) if you have any questions.

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

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<sup>9</sup> City of Los Angeles. Accessed at:  
[http://ladbs.org/LADBSWeb/LADBS\\_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf](http://ladbs.org/LADBSWeb/LADBS_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf).