



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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Tahirah Farris, Planner

Los Angeles County, Regional Planning Department

Attention: General Plan and Transit Oriented Communities Section

320 West Temple Street, 13th Floor

Los Angeles, CA 90012

Los Angeles County Draft Green Zones Ordinance and Notice of Preparation for an Environmental Impact Report for the Green Zones Ordinance

Dear Ms. Farris,

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the Los Angeles County Draft Green Zones Program (Proposed Project) and Notice of Preparation (NOP) for the Proposed Project. The County of Los Angeles is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project.

The Proposed Project aims to promote environmental justice by providing zoning requirements for industrial uses, vehicle-related uses, recycling and solid waste uses that may disproportionately affect communities surrounding these land uses. Assembly Bill (AB) 617 was signed into law in July 2017. It requires new community-focused action to reduce air pollution and improve public health in communities experiencing disproportionate burdens from exposure to air pollutants. The Proposed Project includes portions of AB 617 communities, including East Los Angeles, Florence-Firestone, Walnut Park, West Carson, and West Rancho Dominguez-Victoria. These communities have prioritized air quality concerns (e.g., emissions from industrial uses) related to the Proposed Project.

Recently, the Lead Agency presented an overview of the Proposed Project to the East Los Angeles, Boyle Heights, West Commerce Community Steering Committee (CSC), and plans to present at an upcoming Southeast Los Angeles CSC meeting. South Coast AQMD staff appreciates the Lead Agency's outreach efforts to the CSCs and encourages the Lead Agency to consider the verbal comments provided at the CSC meetings.

Based on a review of the Proposed Project and NOP, South Coast AQMD staff recommends:

1. Additional measures for the Proposed Project to further address emissions from industrial uses (e.g., warehouses and metal facilities), and
2. The analysis of potential air quality and health risk impacts from the Proposed Project should be included in the Environmental Impact Report (EIR).

Detailed comments for the above recommendations are in Attachment A – Recommendations on the Proposed Project and Attachment B – Notice of Preparation of an Environmental Impact Report for the Proposed Project below.

South Coast AQMD staff is available to work with the Lead Agency to ensure that the Proposed Project's air quality and health risk impacts are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at lsun@aqmd.gov.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

JW/JG/IM:DG:LS

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Attachment A – Recommendations on the Proposed Project

1. Warehouse Uses

The Proposed Project requires a Conditional Use Permit (CUP) for warehouses that generate more than 100 truck trips per day within 500 feet of sensitive uses in the Green Zones District. The California Air Resources Board's (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective*¹ (Air Quality and Land Use Handbook)² recommends avoiding siting sensitive land uses within 1,000 feet of warehouses (that accommodates more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units (TRUs) per day, or where TRU unit operations exceed 300 hours per week). To mitigate potential air quality impacts from warehouse uses within the Green Zones District, South Coast AQMD staff recommends that the Lead Agency consider the following measures as part of the Proposed Project for operational air quality impacts from warehouses.

- 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 use and sensitive receptors (e.g., residences), where feasible.
- Require a percentage of onroad trucks used during operation be zero-emission (ZE) or near-zero emission (NZE) trucks that meet CARB's adopted optional NOx emission standard at 0.02 grams per brake horsepower-hour (g/bhp-hr). This percentage should be greater than any requirements potentially required by either South Coast AQMD in a potential future indirect source rule³, or by CARB in a potential future zero emissions fleet rule⁴. Also, evaluate and identify fueling infrastructure needs (e.g., electricity, hydrogen, etc.) for ZE trucks and ZE transport refrigeration units and supportive infrastructure facilities in the Energy and Utilities and Service Systems Sections of the final environmental document, where appropriate.
- Design warehouse use such that entrances and exits do not encourage trucks to traverse past residences, and other nearby sensitive uses.
- Design the warehouse use such that no trucks queue outside of the facility (e.g., ensure that any check-in point for trucks are well inside the project site) and that truck traffic within the project site is located away from the property line(s) closest to the sensitive receptors (e.g., residences).
- Limit the daily number of truck trips allowed to the level analyzed in the certified or approved CEQA document for the warehouse. If higher daily truck volumes are anticipated during operation than what is analyzed in the certified or approved document, the Lead Agency should commit to re-evaluating the warehouse's air

¹ The California Air Resources Board's (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective* accessed at <https://ww3.arb.ca.gov/ch/handbook.pdf>.

² Another resource that can be consulted is CARB's Concept Paper for Freight Facilities, that includes additional ideas for reducing and avoiding air quality impacts associated with land uses dedicated to freight activities. <https://ww2.arb.ca.gov/resources/documents/concept-paper-freight-handbook>.

³ www.aqmd.gov/fbmsm.

⁴ <https://ww2.arb.ca.gov/our-work/programs/advanced-clean-fleets>.

quality and health risks impacts through a CEQA process prior to allowing higher truck activity levels (CEQA Guidelines Section 15162).

- Establish truck routes which avoid sensitive receptor locations and require that the truck routes be used for truck traffic associated with the warehouse.
- Have truck routes clearly marked with trailblazer signs, so that trucks will not enter residential areas that are adjacent to portions of the designated truck routes analyzed in the final environmental document.
- Install adequate signage that prohibits truck idling in certain locations (e.g., near schools and sensitive receptors).
- Restrict overnight truck parking in residential areas.
- Require the installation of electric hook-ups to eliminate idling of main and auxiliary engines during loading and unloading, and when trucks are not in use;
- Ensure that sites are designed with sufficient parking space for charging infrastructure and parking for zero-emissions yard trucks used onsite, as well as additional space potentially for zero emissions onroad trucks that visit the site;
- Require signage that informs truck drivers of CARB regulations (which include anti-idling regulations);
- Maximize the use of solar energy including solar panels. Installing the maximum possible number of solar energy arrays on the building roofs and/or on site to generate solar energy for the facility and/or EV charging stations. Consider requiring onsite battery storage to make greater use of the solar power generated.
- Require the use of electric landscaping equipment, such as lawn mowers and leaf blowers.
- Require use of electric or alternatively fueled sweepers with HEPA filters.
- Maximize the planting of trees in landscaping and parking lots.
- Use light colored paving and roofing materials.
- Utilize only Energy Star heating, cooling, and lighting devices, and appliances.

Additional measures for warehouses are available at

<https://wrcog.us/DocumentCenter/View/318/Good-Neighbor-Guidelines-for-Siting-Warehouse-Distribution-Facilities-PDF?bidId=>.

2. Metal Facilities and Other Industrial Uses

The Proposed Project prohibits metal plating uses within 500 feet of a sensitive land use in the Green Zones District. However, the CARB Air Quality and Land Use Handbook recommends avoiding siting sensitive land uses within 1,000 feet of chrome platers. South Coast AQMD staff recommends that the Lead Agency include requirements in the Green Zones Program consistent with the CARB Air Quality and Land Use Handbook.

Additionally, South Coast AQMD recommends that the Proposed Project require the Los Angeles County Department of Regional Planning to consult with South Coast AQMD to conduct permit cross-checks for new or renewal permit applications for industrial uses (e.g., metal facilities). Permit cross-checks with South Coast AQMD will help the Lead

Agency identify opportunities to reduce emissions from industrial uses and ensure compliance with South Coast AQMD regulations.

3. Signage for Submitting Air Quality Complaints

South Coast AQMD staff recommends that the Proposed Project include signage requirements for industrial uses within the Green Zone Districts and subject to South Coast AQMD rules. South Coast AQMD staff recommends that signage include information about how to submit air quality complaints by phone by calling 1-800-CUT-SMOG or online by visiting www.aqmd.gov. An example of signage requirements is in Paragraph (K) of South Coast AQMD Rule 1430 – Control of Emissions from Metal Grinding Operation at Metal Forging Facilities available at <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1430.pdf>.

4. Damaged Pavement

Damaged pavement at organic and solid waste facilities may result in odor emanating from such facilities. Therefore, South Coast AQMD staff recommends the Lead Agency consider requirements in Chapters 22.140.690 and 22.140.700 to address damaged pavement. An example of pavement requirements is in Paragraph (e)(6) of South Coast AQMD Rule 415 – Odors From Rendering Facilities.

Attachment B – Notice of Preparation of an Environmental Impact Report for the Proposed Project

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. Our comments are recommendations on the analysis of potential air quality impacts from the Proposed Project that should be included in the Environmental Impact Report (EIR). Please send a copy of the EIR upon its completion and public release directly to South Coast AQMD as copies of the EIR submitted to the State Clearinghouse are not forwarded. **In addition, please send all appendices and technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all emission calculation spreadsheets, and air quality modeling and health risk assessment input and output files (not PDF files). Any delays in providing all supporting documentation for our review will require additional review time beyond the end of the comment period.**

CEQA Air Quality Analysis

Staff recommends that the Lead Agency use South Coast AQMD's CEQA Air Quality Handbook and website⁵ as guidance when preparing the air quality and greenhouse gas analyses. It is also recommended that the Lead Agency use the CalEEMod⁶ land use emissions software, which can estimate pollutant emissions from typical land use development and is the only software model maintained by the California Air Pollution Control Officers Association.

South Coast AQMD has developed both regional and localized significance thresholds. South Coast AQMD staff recommends that the Lead Agency quantify criteria pollutant emissions and compare the emissions to South Coast AQMD's CEQA regional pollutant emissions significance thresholds⁷ and localized significance thresholds (LSTs)⁸ to determine the Proposed Project's air quality impacts. The localized analysis can be conducted by either using the LST screening tables or performing dispersion modeling.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips, and hauling trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers and air pollution control devices), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips,

⁵ South Coast AQMD's CEQA Handbook and other resources for preparing air quality analyses can be found at: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>.

⁶ CalEEMod is available free of charge at: www.caleemod.com.

⁷ South Coast AQMD's CEQA regional pollutant emissions significance thresholds can be found at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>.

⁸ South Coast AQMD's guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

should be included in the analysis. Furthermore, emissions from the overlapping construction and operational activities should be combined and compared to South Coast AQMD's regional air quality CEQA *operational* thresholds to determine the level of significance.

Sensitive receptors are people that have an increased sensitivity to air pollution or environmental contaminants and include schools, daycare centers, nursing homes, elderly care facilities, hospitals, and residential dwelling units. The Proposed Project includes, among others, standards for new sensitive land uses within 500 feet of existing industrial, recycling, solid-waste, or vehicle-related uses, and to facilitate the purpose of an EIR as an informational document, it is recommended that the Lead Agency perform a mobile source health risk assessment⁹ to disclose the potential health risks.

The California Air Resources Board's (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective*¹⁰ is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process with additional guidance on strategies to reduce air pollution exposure near high-volume roadways available in CARB's technical advisory¹¹.

The South Coast AQMD's *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*¹² includes suggested policies that local governments can use in their General Plans or through local planning to prevent or reduce potential air pollution impacts and protect public health. It is recommended that the Lead Agency review this Guidance Document as a tool when making local planning and land use decisions.

Mitigation Measures

In the event that the Proposed Project results in significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize these impacts. Any impacts resulting from mitigation measures must also be analyzed. Several resources to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project include South Coast AQMD's CEQA Air Quality Handbook⁵, South Coast AQMD's Mitigation Monitoring and Reporting Plan for the 2016 Air Quality Management Plan¹³, and Southern California Association of Government's Mitigation Monitoring and Reporting Plan for the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy¹⁴.

Health Risk Reduction Strategies

Many strategies are available to reduce exposures, including, but are not limited to, building filtration systems with MERV 13 or better, or in some cases, MERV 15 or better is

⁹ South Coast AQMD's guidance for performing a mobile source health risk assessment can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.

¹⁰ CARB's *Air Quality and Land Use Handbook: A Community Health Perspective* can be found at: <http://www.arb.ca.gov/ch/handbook.pdf>.

¹¹ CARB's technical advisory can be found at: <https://www.arb.ca.gov/ch/landuse.htm>.

¹² South Coast AQMD. 2005. *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*. Available at: <http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf>.

¹³ South Coast AQMD's 2016 Air Quality Management Plan can be found at: <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf> (starting on page 86).

¹⁴ Southern California Association of Governments' 2016-2040 RTP/SCS can be found at: http://scagrtppcs.net/Documents/2016/peir/final/2016fP_EIR_ExhibitB_MM RP.pdf.

recommended; building design, orientation, location; vegetation barriers or landscaping screening, etc. Enhanced filtration units are capable of reducing exposures. However, enhanced filtration systems have limitations. For example, in a study that South Coast AQMD conducted to investigate filters¹⁵, a cost burden is expected to be within the range of \$120 to \$240 per year to replace each filter panel. The initial start-up cost could substantially increase if an HVAC system needs to be installed and if standalone filter units are required. Installation costs may vary and include costs for conducting site assessments and obtaining permits and approvals before filters can be installed. Other costs may include filter life monitoring, annual maintenance, and training for conducting maintenance and reporting. In addition, because the filters would not have any effectiveness unless the HVAC system is running, there may be increased energy consumptions that the Lead Agency should evaluate in the EIR. It is typically assumed that the filters operate 100 percent of the time while residents are indoors, and the environmental analysis does not generally account for the times when the residents have their windows or doors open or are in common space areas of the project. These filters have no ability to filter out any toxic gases. Furthermore, when used filters are replaced, it has the potential to result in emissions from the transportation of used filters at disposal sites and generate solid waste that the Lead Agency should evaluate in the EIR. Therefore, the presumed effectiveness and feasibility of any filtration units should be carefully evaluated in more detail prior to assuming that they will sufficiently alleviate exposures to diesel particulate matter emissions.

¹⁵ This study evaluated filters rated MERV 13 or better. Accessed at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf>. Also see 2012 Peer Review Journal article by South Coast AQMD: <https://onlinelibrary.wiley.com/doi/10.1111/ina.12013>.