



South Coast Air Quality Management District

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January 20, 2015

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Planning and Economic Development Department
Planning Division
City of Compton
205 South Willowbrook Avenue
Compton, CA 90220

Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) for the Proposed Brickyard Commerce Center Project (EA-MND-No. 933)

The South Coast Air Quality Management District (SCAQMD) 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 CEQA document.

The Lead Agency proposes construction of two site plan options on the total 68.48 gross acre project site. Project construction for either plan would include approximately 146,000 cubic yards of cut and fill that will be balanced on-site. Construction is expected to take approximately 1.5 years to complete starting in 2015. Project operations are then estimated to begin at the end of 2017.

Site Plan Option A (Option A) consists of two buildings totaling 1.5 million square feet of light industrial, warehouse distribution uses: Bldg A-1, a 1.43 million square foot light industrial, warehouse distribution building that includes 208 loading docks and Bldg A-2, a separate 70,000 square foot light industrial building with 11 loading docks.

Site Plan Option B (Option B) will have three buildings totaling 1,077,000 square feet including Bldg B-1, a 525,400 square foot light industrial warehouse/distribution building with 88 loading docks; Bldg B-2, a 481,600 square foot light industrial building with 111 loading docks; and Bldg B-3, a 70,000 square foot light industrial building with 11 loading docks.

Based on recommended guidance from the Institute of Transportation Engineers (ITE),¹ the proposed Project's Site Plan Option A could have as many as 2,520 total daily vehicle trips including 960 truck trips operating daily at full-project buildout beginning in year 2017. Estimated vehicle and truck activity for Site Plan Option B could have approximately 1,809 total daily trips including 689 daily truck trips operating at project

¹ ITE, 9th Edition, Land Use 152 High-Cube Warehouse/Distribution Center 152, Weekday Weighted Average Truck Trip Generation Rate of 0.64 trip ends per 1,000 square feet.

buildout also in early 2017. The proposed warehouse logistic center site would operate 24 hours a day, seven days a week. The proposed Project truck routes include South Central, Rosecrans, McKinley and Wilmington Avenues, Avalon Boulevard, and East 120th Street to access the 110, 105, 91 and 710 freeways.² The projected truck traffic would pass by sensitive receptors including single- and multi-family residences, schools (Dickison, Mayo and McKinley Elementary Schools; Davis, Whaley, and Willowbrook Middle Schools; Cesar Chavez High School; and the King-Drew Medical Center.

The Lead Agency analyzed project impacts for both Option A and Option B. Based these analyses, the SCAQMD staff has concerns about the assumptions used to estimate project health affects and air quality impacts since the Lead Agency has determined the analyses showed almost significant residential impacts for cancer risk,³ mostly from project trucks operating from the project site along nearby residential streets.⁴ The SCAQMD staff recommends revising the HRA according to SCAQMD staff comments to better account for potential adverse health affect impacts for workers and residences near the project site and sensitive receptors located along the truck routes.

The SCAQMD staff also has concerns about the modeling assumptions used to estimate project operational, localized and health effect impacts. Specifically, the Lead Agency used the Institute of Transportation Engineers Manual (ITE) 1.68 total vehicle trip rate from the for the High Cube Warehouse land use. Along with using the ITE 1.68 overall vehicle trip rate, the SCAQMD staff recommends using the associated ITE 0.64 daily truck trip rate instead of the non-standard truck rate used in the Draft IS/MND. In addition, the operational trip lengths used in the air quality and related analyses should reflect a conservative, worst-case basis since the future occupants are currently unknown. Finally, the SCAQMD staff recommends that all feasible mitigation measures including a 1,000 foot buffer between the on-site truck activities and nearby sensitive receptors be considered and incorporated into the final Project and Final MND to reduce these impacts. Additional details are included in the attachment.

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final MND. The SCAQMD staff is available to work with the Lead Agency to address these issues and any other air quality questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

² Traffic Impact Analysis Report (Revised November 2014), Hirsch/Green Transportation Consulting, Figure 4(b) Proposed Project Geographic Trip Distribution Percentages (Trucks) and an aerial map inspection.

³ DMND, Mobile Source (Diesel Truck) Health Risk Assessment for the Proposed Brickyard Commerce Center (Warehouse/Distribution Center), Pomeroy Environmental Services (July 2014), Table 3 Project Health Risk Summary, Page 15: (Central Avenue Residences for a 70-Year Exposure have a Maximum Incremental Cancer Risk [MICR] of 9.16 in 1 million with a threshold of >10 in 1 million).

⁴ Ibid, Table 3 – Residences located along Central Avenue (9.16 in 1 million), Sam Littleton Street (8.25 in 1 million) and McKinley Avenue (8.38 in 1 million) Residences. The MICR threshold is >10 in 1 million.

Mr. Robert Delgadillo,
Planning Manager

2

January 20, 2015

Sincerely,

Jillian Baker

Jillian Baker, Ph.D.
Program Supervisor
Planning, Rule Development & Area Sources

Attachment

JB:GM

LAC141223-15
Control Number

Air Quality Analysis – Localized Significance Thresholds (LST) Analysis

Construction

1. In the footnotes in Table 7 (Localized On-Site Peak Daily Construction Emissions), the analysis assumed soil disturbance of four-acres per day and interpolated the thresholds presented in the Draft IS/MND from in the SCAQMD Mass Rate LST Lookup Tables (lookup tables).⁵ These lookup tables with the associated thresholds of significance were developed for screening purposes and are not meant to be interpolated. Rather, they are to be used to determine if emissions would require further analyses, i.e., performing project-specific modeling for project emissions if the Lead Agency prefers more precise results. Based on the footnote assumption in Table 7, the air quality analysis should be revised in the Final MND using the more conservative two-acre threshold tables. These thresholds values are lower than the values shown in the five-acre threshold tables. If the Lead Agency chooses, dispersion analysis can also be performed comparing the modeled concentrations with the Ambient Air Quality Standards for Criteria Pollutant Thresholds found at the SCAQMD website.⁶ Based on the emission estimates in Table 7 compared with the threshold table values for a two-acre site, Project construction localized emissions exceed the two-acre thresholds of significance for construction NOx, PM10 and PM2.5.

Operations

2. Based on the two-acre LST lookup table thresholds for operations, the proposed Project localized operational impacts would exceed the threshold of significance for PM10. (See comment in the preceding paragraph).

Mitigation

3. Mitigation pursuant to CEQA Guidelines §15126.4, §15369.5 should therefore be incorporated into the Final MND both in the final analysis and Project itself.

Air Quality Analysis - Operations

Daily Truck Trip Rate

4. In the Air Quality Impact Analysis, the Lead Agency uses the Institute of Transportation Engineers Trip Generation Manual, 9th Edition, 2012 (ITE) 1.68 overall trip generation rate (for cars + trucks) based on ITE Land Use 152, High-Cube

⁵ SCAQMD Website for Mass Rate LST Lookup Tables at:<http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/appendix-c-mass-rate-lst-look-up-tables.pdf?sfvrsn=2> .

⁶ SCAQMD website for SCAQMD Air Quality Significance Thresholds at <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2> .

Warehouse Distribution Center. Using the ITE 1.68 trip rate estimates approximately 2,402 total daily vehicles for Option A and 1,809 total daily vehicles for Option B. Although the ITE 1.68 overall trip rate is used for the proposed Project, the Lead Agency does not use the associated ITE 0.64 daily truck trip rate from this same reference to estimate daily truck trips for either Option A or Option B.⁷ Rather, the Trip Generation Rates use a 1.337 passenger car daily trip rate and a 0.343 daily truck trip rate.⁸ By using the 0.343 daily truck trip rate, trucks are underestimated for Option A at 515 daily truck trips in the Draft IS/MND instead of approximately 960 daily truck trips using the ITE 0.64 trip rate. For Option B, using ITE 0.64 would yield an estimate of 689 daily truck trips instead of 369 daily truck trips estimated in the Draft IS/MND. Using the non-standard trip rate substantially underestimates project truck operational air quality and health affect impacts.

Absent from an occupant-specific traffic study of known tenants, the Final MND should be consistent and therefore use the associated ITE truck trip rate to estimate project daily truck trips in the air quality and associated analyses. Otherwise, project trips and associated emission and health effect impacts could be substantially underestimated.

On-Road Truck Trip Length

5. In the CalEEMod output sheets provided in Draft IS/MND appendices, the modeling used a 16.6 mile one-way truck trip distance for trucks used by people employed by perspective tenants and an 8.4 one-way trip distance was used by trucks not employed by perspective occupants to estimate operational air quality impacts for trucks moving goods for the proposed facility. The Draft IS/MND did not include, however, information that would substantiate the one-way trip lengths used in the air quality analyses including points of origin, destinations and related distances for goods coming to and leaving the proposed Project site. Absent from an occupant-specific analysis with trip-length information, the SCAQMD staff recommends that all applicable analyses be revised in the Final MND using a one-way trip length that more accurately estimates air quality emission and related impacts based on a more conservative estimate. For example, goods delivered outside of the Basin boundary using the 15 Freeway would travel a one-way distance of approximately 70 miles. If the Lead Agency is therefore uncertain of the types of occupants or the trip lengths, the Lead Agency could alternatively limit activities, as a condition of occupancy, to levels described in the analysis. Otherwise, long-term project air quality impacts for operations and other relative analyses including health affects could be substantially underestimated.

⁷ ITE Manual, High Cube Warehouse Distribution Center (ITE Land Use – 152), 0.64 weighted average Truck Trip Generation Rate (trip ends per 1,000 square feet of gross floor area), Page 267.

⁸ $1.337 + 0.343 = 1.68$.

Health Risk Assessment (HRA) Modeling

6. The Lead Agency used AERMOD (version 11103), which was released on April 13, 2011, to prepare the dispersion modeling for the Health Risk Assessment (HRA). Since then, AERMOD has been updated five times, with the most recent AERMOD (version 14134) released on May 14, 2014. Since the most recent version of AERMOD was available at the time of analysis, SCAQMD staff recommends that the Lead Agency revise the HRA analysis using the latest version of AERMOD (version 14134) to better capture project localized impacts in the Final MND.
7. The HRA analysis for both the resident and worker receptors involved the use of separate discrete receptors placed randomly. The SCAQMD staff recommends that the Lead Agency revise the HRA using a receptor grid over the existing residences and businesses in order to ensure that the maximum impacts to a residential or worker receptor are properly analyzed and accounted for in the Final MND.
8. The HRA only included on-site truck emissions and emissions along a short segment of local roads, which likely underestimated the health risks to existing residents in the project vicinity. According to the SCAQMD's Guidance for performing a mobile source health risk assessment (<http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>), the emissions from the project trucks along local streets and arterials in transit to and from the facility up to the closest freeway need to be analyzed. The SCAQMD staff therefore recommends that the Lead Agency revise the HRA to include the appropriate local roads so that these potential impacts are adequately analyzed in the Final MND.

Mitigation Measures for Operational Air Quality Impacts (Mobile Sources)

Mitigation Directed to Reduce Truck Idling

9. Based on Site Plan A, there will be two gates controlling truck access to Building 1. Although those gates are located in the interior of the project site, the SCAQMD staff is concerned that trucks could queue at those gates while waiting to access Building 1. Because these gates are approximately 200-feet from the nearest residential receptors along both South Central and McKinley Avenues, the SCAQMD staff is concerned about the potential adverse health risks associated with the idling truck emissions while queuing. SCAQMD staff therefore recommends that the Lead Agency provide more details in the Final CEQA document regarding how truck queuing will be avoided. The SCAQMD staff also recommends the following additional mitigation measures to prevent the nearby sensitive receptors from exposure to the project's adverse diesel particulate truck emissions:
 - Design the site such that any check-in point for trucks is well inside the facility to ensure that there are no trucks queuing outside of the facility.
 - Prohibit all vehicles from idling in excess of five minutes, both on- and off-site.

- Post signs informing truck drivers about the California Air Resources Board diesel idling regulations and the health effects of diesel particulate matter.
- Post signs on the interior and exterior of the project site near the gates, requiring the following:
 - Truck drivers shall turn off engines when not in use;
 - Trucks shall not idle for more than five minutes;
 - Telephone numbers of the California Air Resources Board to report violations.
- Improve traffic flow by signal synchronization.
- Have truck routes clearly marked with trailblazer signs, so that trucks will not enter residential areas.

Additional Mitigation Directed to Reduce Mobile Source Emissions

10. In addition to the above measures directed to reduce emissions associated with queuing and on-site truck idling, the Lead Agency may determine that project operation emissions for Volatile Organic Compounds (VOC), Oxides of Nitrogen (NO_x), or health affect impacts might be significant, primarily from on-road truck activity emissions. Since the California Air Resources Board has classified the particulate portion of diesel exhaust emissions as carcinogenic, the SCAQMD staff therefore recommends the following additional measures be incorporated into the Final MND to reduce exposure to sensitive receptors from adverse project operational air quality and health affect impacts:

Additional Mitigation Measures:

- Require the use of 2010 compliant diesel trucks, or alternatively fueled, delivery trucks (e.g., food, retail and vendor supply delivery trucks) at commercial/retail sites upon project build-out. If this isn't feasible, consider other measures such as incentives, phase-in schedules for clean trucks, etc.
- Provide minimum buffer zone of 300 meters (approximately 1,000 feet) between truck traffic and sensitive receptors based on guidance from the California Air Resource Board (CARB) guidance.⁹
- Limit the daily number of trucks allowed at each facility to levels analyzed in the Final 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 higher activity level.
- On-site equipment should be alternative fueled.
- Provide food options, fueling, truck repair and or convenience stores on-site to minimize the need for trucks to traverse through residential neighborhoods.

⁹ CARB: Air Quality and Land Use Handbook: A Community Health Perspective, April 2005, Page4 for Distribution Centers.

- 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 CEQA document, 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.

At a minimum, require upon occupancy that do not already operate 2007 and newer trucks to apply in good faith for funding to replace/retrofit their trucks, such as Carl Moyer, VIP, Prop 1B, or other similar funds. Should funds be awarded, the occupant should also be required to accept and use them.

Electric Vehicle (EV) Charging Stations

11. 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 2012 Regional Transportation Plan. 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, the SCAQMD staff recommends the Lead Agency require the proposed facility 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, the SCAQMD staff recommends that the Lead Agency require at least 5% of all vehicle parking spaces (including for trucks) include EV charging stations.¹⁰ 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.

CNG Fueling Station

12. Should the proposed project generate significant regional NOx operational impacts after revision, the SCAQMD staff recommends that the project pro-actively take measures that could reduce emissions sooner rather than later. The SCAQMD staff therefore recommends that the Lead Agency ensure the availability of alternative fueling facility (e.g., natural gas) to serve the project site prior to operation of any logistics warehousing within the project area.

¹⁰ http://ladbs.org/LADBSWeb/LADBS_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf

Mitigation Measures for Operational Air Quality Impacts (Other)

13. Should the Lead Agency determine through further analyses that the project's regional operational air quality impacts exceed the SCAQMD recommended threshold of significance for NO_x, the SCAQMD staff recommends the following on-site area source mitigation measures be incorporated into the proposed Project and Final CEQA document pursuant to CEQA Guidelines §15126.4, §15369.5.

- Maximize use of solar energy including solar panels; installing the maximum possible number of solar energy arrays on the building roofs and/or on the Project site to generate solar energy for the facility.
- Use light colored paving and roofing materials.
- Utilize only Energy Star heating, cooling, and lighting devices, and appliances.
- Install light colored "cool" roofs and cool pavements.
- Limit the use of outdoor lighting to only that needed for safety and security purposes.
- Require use of electric or alternatively fueled sweepers with HEPA filters.
- Use of water-based or low VOC cleaning products.