



South Coast Air Quality Management District

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City of Santa Fe Springs, Planning and Development Department
11710 Telegraph Road
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Draft Environmental Impact Report (DEIR) for the Proposed Goodman Logistics Center (GLC)

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 to demolish a former refinery, grade, and construct a business park development/warehouse totaling approximately 1,210,800 square feet. The project will consist of three new concrete tilt-up buildings.

The Lead Agency has determined that mitigated construction emissions are less than the SCAQMD recommended thresholds of significance during construction. The SCAQMD staff has concerns about the assumptions used in the modeling to estimate regional, localized and health effect impacts. Additional details are included in the attachment.

Pursuant to Public Resources Code Section 21092.5, SCAQMD staff requests that the Lead Agency provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. 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 Jack Cheng, Air Quality Specialist CEQA Section, at (909) 396-2448, if you have any questions regarding the enclosed comments.

Sincerely,

Jillian Wong

Jillian Wong, Ph.D.

Program Supervisor

Planning, Rule Development & Area Sources

Attachment

JW:JC

LAC150212-08

Control Number

ATTACHMENT

Air Quality Analysis – Construction

1. The Lead Agency indicates that the former occupant, Powerline Oil Refinery, will be responsible for removing all above ground tanks while the Lead Agency is responsible for removing all existing underground on-site improvements. Since the project includes demolition, the Lead Agency must comply with SCAQMD Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities. Please provide additional information regarding compliance with SCAQMD Rule 1403 in the Final EIR. Additionally, SCAQMD staff recommends that the Lead Agency include the emissions from demolition and hauling related activity in the Air Quality Analysis in the Final EIR, in order to avoid underestimating the project's air quality impacts.
2. Based on a review of the DEIR, the SCAQMD staff is concerned about the potential air quality impacts from VOC contaminated soils during remediating or extracting contaminated soil. Disturbing soils that may contain petroleum hydrocarbons are subject to the requirements of SCAQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil. Rule 1166 should be incorporated during the development of the Final EIR. If remediation or any on-site activity involves equipment or operations which either emits or controls air pollution, SCAQMD staff should be consulted in advance of the project start to determine whether or not any permits or plans are required to be filed and approved by SCAQMD prior to start of the operation. Additionally, SCAQMD staff recommends that the Lead Agency include the emissions from soil excavation/remediation and hauling related activity in the Air Quality Analysis in the Final EIR. Furthermore, the Final EIR should discuss how the project will comply with SCAQMD Rule 402 – Public Nuisance if volatile organic compounds and/or odors are emitted during soil disturbance activities.

Air Quality Analysis – Trip Generation

3. In the Trip Generation Section, the Lead Agency estimates that the project will generate approximately 453 AM Peak Hour Passenger Car Equivalent (PCE) trips and 483 PM Peak Hour PCE trips. It is unclear what trip rates were used and how the PCE values were calculated in this section. Additionally, CalEEMod Trip Summary Information estimates 3,136 PCE Average Daily Trips but does not provide additional details on how this value was derived. The 20 percent truck trip rate use in the Traffic Study is inconsistent with the Trip Type/fleet mixture values used in CalEEMod. SCAQMD staff recommends that the Lead Agency provide additional trip generation details and use consistent values throughout the Final EIR.

Mobile Health Risk Assessment

4. Since the proposed project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, SCAQMD staff recommends that the lead agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment (“*Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*”) can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included. This will ensure that the health risks from the project are disclosed to the public.

Mitigation Measures for Construction Air Quality Impacts

5. Based on a review of the DEIR the Lead Agency determined that with mitigation measures, the proposed project will not result in significant air quality impacts during construction. SCAQMD staff recommends the following changes and additional measures be incorporated into the proposed project and FEIR to further reduce project impacts in addition to the measures included in the DEIR.

~~Mitigation Measure 7 (Construction Air Quality Impacts). The Applicant shall ensure that the contractors adhere to all pertinent SCAQMD protocols regarding grading, site preparation, and construction activities. The contractors would be responsible for being familiar with, and implementing any pertinent best available control measure.~~

Consistent with measures that other lead agencies in the region (including Port of Los Angeles, Port of Long Beach, Metro and City of Los Angeles)¹ have enacted, require all on-site construction equipment to meet EPA Tier 3 or higher emissions standards according to the following:

- Post-January 1, 2015: All off-road diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

Recommended Additions

¹ For example see the Metro Green Construction Policy at: http://www.metro.net/projects_studies/sustainability/images/Green_Construction_Policy.pdf

- Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export) and if the lead agency determines that 2010 model year or newer diesel trucks cannot be obtained the lead agency shall use trucks that meet EPA 2007 model year NOx emissions requirements.
- A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.
- Encourage construction contractors to apply for SCAQMD "SOON" funds. Incentives could be provided for those construction contractors who apply for SCAQMD "SOON" funds. The "SOON" program provides funds to accelerate clean up of off-road diesel vehicles, such as heavy duty construction equipment. More information on this program can be found at the following website:
<http://www.aqmd.gov/home/programs/business/business-detail?title=vehicle-engine-upgrades>

For additional measures to reduce off-road construction equipment, refer to the mitigation measure tables located at the following website:
<http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies> .

Mitigation Measures for Operational Air Quality Impacts (Mobile Sources)

6. SCAQMD staff recommends the addition of the following Mitigation Measures to further reduce project impacts during operation:
 - 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.²
 - Limit the daily number of trucks allowed at each facility to levels analyzed in the Final EIR. 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.
 - 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.

² CARB: Air Quality and Land Use Handbook: A Community Health Perspective, April 2005, Page4 for Distribution Centers.

- 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.
- Improve traffic flow by signal synchronization.
- Have truck routes clearly marked with trailblazer signs, so that trucks will not enter residential areas.
- Because the proposed Project generates 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 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

7. 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.³ 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.

³ http://ladbs.org/LADBSWeb/LADBS_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf

Mitigation Measures for Operational Air Quality Impacts (Other)

8. In addition to the mobile source mitigation measures identified above, the SCAQMD staff recommends the following on-site area source mitigation measures below to reduce the project's regional air quality impacts from VOC, CO, NO_x, PM₁₀ and PM_{2.5} emissions during operation. These mitigation measure should be incorporated 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.