



South Coast Air Quality Management District

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Draft Environmental Impact Report (DEIR) for the Proposed San Geronio Crossings Project (GP Amendment No. 1079; CZ No. 7799; PP No. 25337; and P. Map No. 36564)

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.

The lead agency proposes the construction and operation of two concrete tilt up type buildings for industrial and warehouse/logistics uses totaling approximately 1.82 million square feet (sf) on with unknown tenants on an undeveloped site approximately 229 acres in size. The proposed project is planned to allow for operation up to 24 hours per day, 7 days a week. The project will develop approximately 140.23 acres with the remaining acreage planned as natural open space. Building 1 is planned to be approximately 811,000 square feet in size with 136 dock doors and Building 2 approximately 1,012,760 square feet with 170 dock doors. Both buildings will have a total combined office space of approximately 30,000 square feet (about 15,000 sf of office space per building). 1,237 spaces are provided for warehouse and trailer parking with 120 parking spaces planned for office use. The DEIR estimates that the proposed project will generate approximately 3,126 total daily vehicle trips including 1,191 diesel trucks. Approximately 2.3 million cubic yards of soil disturbance is planned, balanced on-site. Construction is planned for one phase starting in early 2017 with building occupancy planned in late 2017.

In January 15, 2015, the SCAQMD staff responded to an initial request by the lead agency for consultation regarding the proposed project. SCAQMD staff's comment letter¹ provided guidance for the air quality analyses and documentation needed to review the proposed project's potential air quality and health risk impacts including the request for supporting electronic data modeling input files (electronic files). The letter also specified that any delay in providing supporting air quality documentation would require additional time for review beyond the end of the comment period. Based on the documentation received in the DEIR, SCAQMD staff requested the Health Risk Assessment (HRA) electronic files from the lead agency on December 1, 2016 and followed up that request on January 12, 2017. On January 17, 2017,² the lead agency

¹ <http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2015/january/pcriversidepp25337.pdf>

² The lead agency sent the electronic files by email attachment on Tuesday, January, 17, 2017 at 2:06 pm. Comments are officially due on Wednesday, January 18, 2017 by 5:00 pm.

sent the requested HRA electronic files to SCAQMD staff as an e-mail attachment. Because of the short amount of time to review these files, SCAQMD staff contacted the lead agency requesting additional time to review the electronic files. This request for extension to comment was made by email and by a telephone voice message on Tuesday, January 17, 2017 at 2:30 pm. As of January 18, 2017, the lead agency did not respond to SCAQMD staff's request for additional time as indicated in our earlier comment later dated January 15, 2015. Since supporting information relied on by the DEIR was not available to the public during the comment period, SCAQMD staff recommends extending the comment period to allow for additional review.

In the DEIR, the lead agency conducted a HRA to determine the long-term air quality impacts from diesel vehicles generated by the proposed project. The HRA found that maximum cancer risk from the project is 6 in one million, which is less than the SCAQMD significance threshold of 10 in one million. SCAQMD staff has concerns about the assumptions used in the modeling, which likely underestimates the health risks. It is possible that SCAQMD staff would have additional comments after reviewing the electronic files. In addition, the lead agency has determined air quality impacts from construction and operations will exceed SCAQMD daily significance thresholds. SCAQMD staff has additional concerns about the effectiveness of the proposed mitigation measures, mainly from construction coating operations and truck activity during operations. SCAQMD staff therefore recommends changes to the measures included in the DEIR and additional measures to further reduce the projected significant impacts. 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. Further, staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist, CEQA Section, at (909) 396-3302, if you have any questions regarding the enclosed comments.

Sincerely,

Jillian Wong

Jillian Wong Ph.D.

Planning & Rules Manager

Planning, Rule Development & Area Sources

Attachment

JW:JC:GM

RVC161129-06

Control Number

ATTACHMENT

Air Quality Analysis

Health Risk Assessment (HRA) Analyses

1. The SCAQMD staff is concerned that the HRA has underestimated the cancer risks from the proposed project. In the HRA, the lead agency used the AERMOD dispersion model to estimate DPM concentrations from the diesel vehicles generated by the proposed project and used the 2003 OEHHA guidelines to estimate the health risks to residents in the project vicinity. Additionally, the lead agency performed a supplemental HRA following the 2015 revised OEHHA guidelines. SCAQMD staff recommends the lead agency revise the HRA based on the following comments:
 - a) Air dispersion models and emission rate calculations were provided on January 17, 2017 at 2:06 pm. SCAQMD staff was not provided substantial time to review emission rate calculations, air dispersion modeling, or the HRA. As indicated in our comment letter dated January 15, 2015, SCAQMD staff requested all air quality modeling, health risk assessment files, and original emission calculation spreadsheets. Since supporting information relied on by the DEIR was not available to the public during the comment period, SCAQMD staff recommends extending the comment period to allow for additional review.

Without modeling files, SCAQMD staff was unable to verify emission rates, sources, sensitive receptors locations, ground level concentrations, and the Maximum Individual Cancer Risk (MICR).
 - b) On-site idling sources should span the entire dock area. SCAQMD staff recommends that the lead agency revise the HRA using a line volume source that spans the entire dock area to ensure that the health risk impacts are not underestimated.
 - c) On-site and off-site truck movement source parameters (DB1W22 – PW = 7.32m, DOFFD1 – PW = 15m, DOFFST2 – PW = 8m) are inconsistent. SCAQMD staff recommends revising the HRA in the Final EIR following the U.S. EPA's haul road methodology when modeling the on-site and off-site truck movement.
 - d) On-site truck movement is estimated at 15 mph. Emissions are typically lower at higher speeds. Therefore, SCAQMD staff recommends calculating on-site truck movement emissions using 5 mph, which is more representative on on-site truck speeds.
 - e) SCAQMD staff was unable to verify EMFAC2014 emission factors used in the emissions calculations. SCAQMD staff recommends providing the input and output files for EMFAC2014 and extending the comment period to allow SCAQMD staff's review.

SCAQMD Rules and Regulations

SCAQMD Rule 403(e) – Large Operations

2. Under Regional Regulations starting on page 3.3-3 of the DEIR, the lead agency includes SCAQMD Rule 403- Fugitive Dust. Based on the project description, however, the proposed project is also considered a large operation, as defined by 50 acres or more of disturbed surface area; or daily earth-moving operations of 3,850 cubic yards or more on three days in any year) in the South Coast Air Basin. Therefore, the lead agency is required to comply with all SCAQMD Rule 403(e) – Additional Requirements for Large Operations. This may include but not limited to Large Operation Notification, appropriate signage, additional dust control measures, and employment of a dust control supervisor that has successfully completed the Dust Control in the South Coast Air Basin training class. Therefore, the Final EIR should contain a detailed description of how the Project will comply with Rule 403(e). Please contact dustcontrol@aqmd.gov for more information.

Additional requirements include but are not limited to:

- Implementation of Table 2 of Rule 403 at all times and implementation of the actions specified in Table 3 of Rule 403 when applicable.
- Submittal of a fully executed Large Operation Notification to the Executive Officer.
- Maintenance of daily records to document the specific dust control actions taken.
- Installation and maintenance of project signage with project contact person that meets the minimum standards of Rule 403 Implementation Handbook.
- Identification of a dust control supervisor that has completed the SCAQMD Fugitive Dust Control Class.

SCAQMD Rule 1113 – Architectural Coatings

3. Based on the air quality analysis, lead agency has determined that emissions generated during the application of architectural coatings during building construction exceed the recommended SCAQMD regional ROG daily threshold of 75 pounds per day using coatings that do not comply with SCAQMD Rule 1113 - Architectural Coatings. Based on the CalEEMod modeling inputs and in MM AQ-1c (a), 100 grams per liter was used instead of the required 50 grams per liter, as required by Rule 1113. The air quality analysis and the Final EIR should be revised to reflect the 50 grams per liter requirement. Finally, since complying with a rule, regulation, law, etc., is a requirement, it is not mitigation. The Final EIR should include the current wording in Rule 1113 but not include compliance with Rule 1113 as a mitigation measure.

Construction Mitigation Measures

4. Based on the lead agency's determination that regional construction emissions during architectural coating operations will exceed the SCAQMD recommended threshold of significance for reactive organic compounds (ROG), SCAQMD staff recommends the following additional mitigation measures to further reduce the significant ROG project construction impact:

Recommended Additions:

- Use coatings and solvents with a VOC content lower than required under Rule 1113.
- Construct/build with materials that do not require painting.
- Use pre-painted construction materials.

Operational Mitigation Measures - Mobile Sources

5. In order to address the significant on-road mobile source emissions from oxides of nitrogen (NOx) during operations, SCAQMD staff SCAQMD staff recommends the following change and additional mitigation measures in addition to the measures included in the DEIR starting on page 3.3-31 in order to further reduce that significant impact:

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 and 2016 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 on-site 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 warehouse 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.

Recommended Change:

MM AQ-1h

- b) A minimum of ~~two electric~~ at least 5% of all vehicle parking spaces shall be provided to include EV vehicle-charging stations³ for automobiles or light-duty trucks shall be provided at each building.

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

Recommended Additions:

- 1) Accelerating the introduction of cleaner trucks through a project requirement that all heavy duty trucks generated by the project will be required to meet or exceed the U.S. EPA's 2010 heavy duty engine emission standards or be powered by natural gas, electricity, or other diesel alternative.
- 2) 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.
- 3) 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.
- 4) 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.
- 5) 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.⁴

⁴ CARB: Air Quality and Land Use Handbook: A Community Health Perspective, April 2005, Page4 for Distribution Centers.