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Mitigated Negative Declaration (MND) for the Proposed MC&C Commerce Center, Site IV

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 MND.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to build six warehouse buildings totaling 115,801 square feet on 8.68 acres (Proposed Project). At the time of the MND, tenants are unknown. Approximately 175 daily truck trips would be expected during the operation[1]. Based on a review of Figure 2-3, *Local Map*, in the MND and aerial photographs, SCAQMD staff found that the Proposed Project is surrounded by industrial uses and vacant lands. Construction of the Proposed Project is expected to take 10 months to complete[2].

SCAQMD Staff's Comments

General Comments

The Lead Agency circulated the MND for the Proposed Project for a 20-day public review and comment period from January 15, 2019 to February 4, 2019[3]. SCAQMD staff received the MND for review on March 22, 2019, and no appendices or technical documents related to the Proposed Project's air quality analysis (e.g., CalEEMod modeling input and output files and emissions calculation sheets) were included in the MND for review. Given a limited review time and absence of all technical modeling files and supporting documentation in both PDF and electronic versions, SCAQMD staff is submitting the following comments to the Lead Agency for consideration.

Daily Truck Trip Rate

According to the Air Quality Section, the Proposed Project's long-term operational emissions were calculated based on the traffic data, and the daily truck trips were based on the City of Fontana Truck Trip Generation Study (Fontana Study)[4]. In other words, the Fontana Study was used to estimate the Proposed Project's air quality operational impacts. Absent from a specific traffic study of known tenants, SCAQMD staff recommends that the Final MND use the ITE's daily truck trip rate of 0.64 to estimate daily truck trips to avoid underestimating the Proposed Project's truck trips and associated long-term operational emissions and health impacts.

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1 MND. Page 95.
2 MND. Page 27.
3 South Coast Air Quality Management District. Staff (Ms. Lijin Sun) e-mail correspondence with the City of Santa Fe Springs (Mr. Vince Velasco) on March 21, 2019.
4 MND. Page 95.

Mobile Source Health Risk Assessment (HRA)

Since the Proposed Project involves operation of six warehouses that are capable of generating and attracting vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended 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.

Cumulative Air Quality Impact Analysis

The Lead Agency did not include a cumulative air quality analysis in the MND as substantial evidence to support a finding that the Proposed Project will not have impacts that are individually limited, but cumulatively considerable[5]. The Proposed Project's air quality and health risks impacts should be evaluated in connection with the effects of probable future warehouse projects (CEQA Guidelines 15065(a)(3)). Based on a review of the MND for another warehouse project – "MC&C Commerce Center, Site III" – prepared by the Lead Agency, SCAQMD staff found that the Proposed Project and MC&C Commerce Center, Site III have the same developer or project applicant (Dan Broder, Kearny Real Estate Company[6]) and will be built within 0.4 miles of each other. As such, the Proposed Project's construction and operational activities might overlap with the construction and operational activities of the other warehouse located in the vicinity of the Proposed Project. The Proposed Project's regional and localized criteria pollutants emissions, as well as health impacts, from heavy-duty, diesel-fueled haul truck trips might have been individually limited, but cumulatively considerable. Therefore, SCAQMD staff recommends that the Lead Agency revise the air quality analysis to include a meaningful evaluation of the Proposed Project's cumulative air quality and health risks impacts in the Final MND. This facilitates the purpose and goal of CEQA on public disclosure and are useful to decision makers and the public who are interested in the Proposed Project. In the event that the Lead Agency finds that the Proposed Project's effects on air quality would be cumulatively significant, mitigation measures will be required to reduce the effects to less than significant pursuant to CEQA Guidelines Sections 15070 and 15071(e).

Additional Recommended Mitigation Measures

While the Lead Agency found that the Proposed Project's long-term operational impacts would be less than significant, SCAQMD staff recommends that the Lead Agency incorporate the following mitigation measures in the Final MND to further reduce the Proposed Project's long-term NOx emissions. For more information on potential mitigation measures as guidance to the Lead Agency, please visit SCAQMD's CEQA Air Quality Handbook website[7].

a) Maintain vehicle and equipment maintenance records for the construction portion of the Proposed Project. All construction equipment and vehicles must be tuned and maintained in compliance with the manufacturer's recommended maintenance schedule and specifications. All maintenance records for each vehicle and equipment and their construction contractor(s) should be made available for inspection and remain on-site for a period of at least two years from completion of construction.

[5] MND. Page 109.
[6] MND. Page 3.
[7] South Coast Air Quality Management District. http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook.

b) Enter into a contract that notifies all construction vendors and contractors that vehicle idling time will be limited to no longer than five minutes or another time-frame as allowed by the California Code of Regulations, Title 13 section 2485 - CARB's Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling. For any vehicle delivery that is expected to take longer than five minutes, each project applicant, project sponsor, or public agency will require the vehicle's operator to shut off the engine. Notify the vendors of these idling requirements at the time that the purchase order is issued and again when vehicles enter the gates of the facility. To further ensure that drivers and operators understand the idling requirement, post signs at the entry of the construction site and throughout the Proposed Project site stating that idling longer than five minutes is not permitted.
c) Encourage construction contractors to apply for SCAQMD "SOON" funds. The "SOON" program provides funds to applicable fleets for the purchase of commercially-available low-emission heavy-duty engines to achieve near-term reduction of NOx emissions from in-use off-road diesel vehicles. More information on this program can be found at SCAQMD's website: http://www.aqmd.gov/home/programs/business/business-detail?title=off-road-diesel-engines.

Mitigation Measures for Operational Air Quality Impacts from Mobile Sources

d) Require the use of zero-emission or near-zero emission heavy-duty trucks during operation, such as trucks with natural gas engines that meet CARB's adopted optional NOx emissions standard of 0.02 grams per brake horsepower-hour (g/bhp-hr). At a minimum, require that operators of heavy-duty trucks visiting the Proposed Project during operation commit to using 2010 model year or newer engines that meet CARB's 2010 engine emission standards of 0.01 g/bhp-hr for particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks. Include analyses to evaluate and identify sufficient power available for zero emission trucks and supportive infrastructures in the Energy and Utilities and Service Systems Sections of the Final MND, where appropriate.
e) Provide electric vehicle (EV) charging stations, or at a minimum, require the Proposed Project to be constructed with the appropriate infrastructure to facilitate sufficient electric charging for trucks to plug-in. Electrical hookups should be provided at the onsite truck stop for truckers to plug in any onboard auxiliary equipment. Electrical panels should be appropriately sized to allow for future expanded use. Include analyses to evaluate and identify sufficient power available for zero emission trucks and supportive infrastructures (e.g., EV charging stations) in the Energy and Utilities and Service Systems Sections of the Final MND, where appropriate.
f) Require trucks to use the truck route that was analyzed in the Health Risk Assessment of the Final MND.
g) Have truck routes clearly marked with trailblazer signs so that trucks will not enter residential areas.
h) Limit the daily number of truck trips allowed at the Proposed Project to the level that was analyzed in the Final MND (e.g., 175 daily truck trips). If higher daily truck volumes are anticipated during operation, the Lead Agency should commit to re-evaluating the Proposed Project's air quality impacts through CEQA prior to allowing higher activity levels.
i) Design the Proposed Project such that entrances and exits are such that trucks are not traversing past neighbors or other sensitive receptors.
j) Design the Proposed Project 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 and away from residential or sensitive receptors to the maximum extent that is feasible and practicable.
k) Design the Proposed Project to ensure that truck traffic within the Proposed Project site is located away from the property line(s) closest to its residential or sensitive receptor neighbors.
l) Restrict overnight parking in residential areas.

m) Establish overnight parking within the industrial building where trucks can rest overnight.
n) Establish area(s) within the Proposed Project site for repair needs.
o) Develop, adopt and enforce truck routes both in and out of the City, and in and out of facilities.
p) Provide incentives for employees in order to encourage the use of public transportation or carpooling, such as discounted transit passes or carpool rebates.
q) Implement a rideshare program for employees and set a goal to achieve a certain participation rate over a period of time.

Mitigation Measures for Operational Air Quality Impacts from Area Sources

r) 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 the Project site to generate solar energy for the facility.
s) Require the use of electric landscaping equipment, such as lawn mowers and leaf blowers.
t) Require use of electric or alternatively fueled sweepers with HEPA filters.
u) Maximize the planting of tress in landscaping and parking lots.
v) Use light colored paving and roofing materials.
w) Utilize only Energy Star heating, cooling, and lighting devices, and appliances.

Closing

Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process. Please provide SCAQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, response should provide sufficient details 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 do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and the public who are interested in the Proposed Project. Further, when the Lead Agency makes a finding that the additional recommended mitigation measures are not feasible, the Lead Agency should describe the specific reasons for rejecting or substituting it in the Final MND (CEQA Guidelines Section 15074.1).

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 if you have any questions.

Sincerely,

Lijin Sun

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