



South Coast Air Quality Management District

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SENT VIA USPS AND E-MAIL:

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Mitigated Negative Declaration (MND) for the Proposed Waterman South Distribution Center

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 and Air Quality Analysis

The Lead Agency proposes to construct and operate a 393,199-square-foot (sf) warehouse with unknown occupants on an approximately 16.5-acre site (Proposed Project). The MND estimates approximately 1,400 total vehicle trips, including approximately 286 daily diesel truck trips¹. In the Air Quality Section, the Lead Agency quantified the Proposed Project's construction and operational emissions and compared those emissions to SCAQMD's recommended regional and localized air quality CEQA daily significance thresholds. The Lead Agency found that localized and regional daily construction and operational air quality impacts are less than significant. The Lead Agency also conducted a health risk assessment (HRA) and found that the Maximum Exposed Individual Resident cancer risk would be 0.88 in one million which is below SCAQMD's CEQA significance threshold of 10 in one million for cancer risk².

SCAQMD staff has concerns about the HRA analysis in the MND. Details are included in the attachment. After revising the HRA analysis, should the Lead Agency find that Proposed Project's health impacts will exceed 10 in one million, mitigation measures are required. SCAQMD staff has included a list of mitigation measures in the attachment to assist the Lead Agency in identifying feasible mitigation measures which have the potential to substantially lessen significant adverse air quality effects as stated in Public Resources Code Section 21002.

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. 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 Ms. Lijin Sun, Program Supervisor, CEQA IGR Section, at (909) 396-3308 if you have any questions.

¹ MND. Table 16-7: Summary of Project Trip Generation REDA South Distribution Center.

² *Ibid.* Table 3-7: Health Risk Results – Waterman South Distribution Center.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment

LS:JC

SBC171208-03

Control Number

ATTACHMENT

Health Risk Assessment (HRA)

1. The Lead Agency states that 2018 will be the opening year for the Proposed Project. However, in the HRA emission estimates³, the Lead Agency used emission factors from 2019. By using 2019 emission factors, the Lead Agency may have under-estimated emissions and associated health risks. SCAQMD staff recommends revising the HRA to incorporate 2018 emission factors.
2. The Lead Agency used the non-default Dispersion Coefficient option Rural in the dispersion modeling. SCAQMD modeling guidance requires the use of the Urban Option. Additionally, the U.S. EPA recommends modeling all sources within an urban complex in AERMOD using the urban option even if some sources may be defined as rural⁴. As such, SCAQMD staff recommends that the Lead Agency revise the HRA using the Urban Option or provide an explanation for justifying the use of the Rural Option.
3. The dispersion modeling is inconsistent with the site plan. The dispersion modeling places idling emissions west of the on-site truck travel. Idling emissions should be placed along the loading docks which is located east of the on-site truck travel routes. SCAQMD recommends revising the HRA to ensure accuracy and consistency with the site plan.
4. The Lead Agency calculated idling emissions using a 5-minute per day assumption. The 5-minute idling assumption will likely underestimate emissions and health risks from idling. SCAQMD staff recommends calculating idling emissions using 15 minutes of idling to ensure that impacts are properly analyzed. The 15-minute idling includes the emissions generated when entering the Proposed Project site while heading towards the dock area; idling at the dock; and the emissions generated when leaving the docks while departing from the Proposed Project. Therefore, the 15-minute idling is a more realistic representation of the idling activities and serves as a conservative estimate of idling emissions.
5. Receptor locations should be placed at the boundaries of the residential property and not on the residential structure since residents have the potential to spend time outdoors (e.g., recreation, dining, etc.). Placing receptors on the residential structure will likely underestimate potential cancer risks. Therefore, SCAQMD staff recommends that the Lead Agency revise the HRA modeling and start the receptor grid at the property boundaries to ensure potential maximum concentrations are identified.
6. The findings on Table 3-7: Health Risk Results – Waterman South Distribution Center are inconsistent with the Health Risk Assessment calculations provided by the Lead Agency⁵. Table 3-7 states that health risk impacts would be 0.88 in a million while the Health Risk Assessment calculations state health risk impacts would be 2.49 in a million. SCAQMD staff recommends that the Lead Agency correct the inconsistency in the Final MND and the supporting Health Risk Assessment to provide meaningful public disclosure with accurate information.

³ Digital file: *Waterman_SE_Emissions_Operations(11-17-17)_Final.xls* – Table “EMFAC2014 run-RUNEX”. December 27, 2017.

⁴ U.S. Environmental Protection Agency, Office of Air Quality Planning and Standards, Air Quality Assessment Division. August 3, 2015. *AERMOD Implementation Guide*. Accessed at: https://www3.epa.gov/ttn/scram/7thconf/aermod/aermod_implmnt_guide_3August2015.pdf.

⁵ Digital file: *WatermanSHRARes-Sensresults12-5-17.xls* – Table “Summary”. December 27, 2017.

Recommended Mitigation Measures for Operational Air Quality Impacts (Mobile Sources)

7. CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse impacts. In the event that the Lead Agency, after revising the HRA analysis based on the comments provided above, finds that the Proposed Project would result in significant health risk impacts, SCAQMD staff recommends incorporating the following on-road mobile-source truck related mitigation measures in the Final MND. For more information on potential mitigation measures as guidance to the Lead Agency, please visit SCAQMD's CEQA Air Quality Handbook website⁶.
 - a. Require the use of 2010 and newer haul trucks (e.g., material delivery trucks and soil import/export). In the event that that 2010 model year or newer diesel haul trucks cannot be obtained, provide documentation as information becomes available and use trucks that meet EPA 2007 model year NOx emissions requirements⁷, at a minimum. Additionally, consider other measures such as incentives, phase-in schedules for clean trucks, etc.
 - b. Have truck routes clearly marked with trailblazer signs, so that trucks will not enter residential areas.
 - c. Develop, adopt, and enforce truck routes in and out of facilities.
 - d. Limit the daily number of trucks allowed at the facility to levels analyzed in the Final MND (286 diesel truck trips per day as analyzed in the MND). If higher daily truck trips are anticipated to visit the site, the Lead Agency should commit to re-evaluating the Project's impacts through CEQA prior to allowing this land use or higher activity level.
 - e. Provide electric vehicle (EV) Charging Stations (see the discussion below under "g." regarding EV charging stations).
 - f. Should the Proposed Project generate 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 MND, 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.
 - g. 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 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy⁸. 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, 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. Similar to the City of Los Angeles requirements for all new projects, SCAQMD staff recommends that the Lead Agency require at least 5% of all vehicle parking

⁶ South Coast Air Quality Management District. <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.

⁷ Based on a review of the California Air Resources Board's diesel truck regulations, 2010 model year diesel haul trucks should have already been available and can be obtained in a successful manner for the project construction California Air Resources Board. March 2016. Available at: <http://www.truckload.org/tca/files/ccLibraryFiles/Filename/000000003422/California-Clean-Truck-and-Trailer-Update.pdf> (See slide #23).

⁸ Southern California Association of Governments. Adopted April 7, 2016. Available at: <http://scagtrpccs.net/Pages/default.aspx>.

- spaces (including for trucks) include EV charging stations.⁹ 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.
- h. 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/distribution center and sensitive receptors.
 - i. Design the warehouse/distribution center such that entrances and exits are such that trucks are not traversing past neighbors or other sensitive receptors.
 - j. Design the warehouse/distribution center such that any check-in point for trucks is well inside the Proposed Project to ensure that there are no trucks queuing outside of the facility boundaries.
 - k. Design the warehouse/distribution center to ensure that truck traffic within the Proposed Project is located away from the property line(s) closest to residences or sensitive receptors.
 - l. Restrict overnight parking in residential areas.
 - m. Establish overnight parking within the warehouse/distribution center where trucks can rest overnight.
 - n. Establish designated area(s) within the Proposed Project for repair needs away from residences or sensitive receptors.

⁹City of Los Angeles. March 30, 2017. Accessed at:
http://ladbs.org/LADBSWeb/LADBS_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf.