



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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Draft Environmental Impact Report (DEIR) for the Proposed DJT4 Parcel Delivery Facility Project (Proposed Project) (SCH No. 2023070241)

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to review the above-mentioned document. The City of Brea is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff (Staff) has provided a brief summary of the project information and prepared the following comments.

South Coast AQMD Staff's Summary of Project Information in the DEIR

The Proposed Project consists of demolishing an existing 637,503 square-foot (sq ft) office building and surface parking lot to construct and operate a 181,500 sq ft parcel delivery facility on an approximately 31.6-acre site.¹ The parcel delivery facility will consist of 163,350 sq ft of warehouse and storage space and 18,150 sq ft of ancillary office space. Once in operation, the Proposed Project would include 1,065 vehicle parking spaces (304 automobile spaces, 757 delivery van spaces, and four line-haul truck trailer spaces), 180 ancillary van spaces (90 loading spaces and 90 staging spaces), and 13 Utility Tractor Rig loading spaces. The Proposed Project is expected to generate a maximum of 2,098 vehicle trips per day (1,049 vehicles inbound plus 1,049 vehicles outbound), which includes 62 truck trips (31 trucks inbound plus 31 trucks outbound).² The project is located at 275 Valencia Avenue, City of Brea, California 92823.³ The nearest sensitive receptors, consisting of residences that are part of a master-planned mixed-use community, are located approximately 116 feet east of the Proposed Project site.^{4,5} Construction is anticipated to begin in the second quarter of 2025 and is expected to last approximately 24 months.^{6,7}

South Coast AQMD Staff's Comments

¹ Draft Environmental Impact Report for the Proposed DJT4 Parcel Delivery Facility Project (DEIR). 1.0 Executive Summary, p. 1-1 & 1-2.

² DEIR. 5.1 Air Quality, p. 5.1-24 & 5.1-33.

³ *Ibid.* 7.0 Other CEQA Considerations, p. 7-14.

⁴ *Ibid.* 5.1 Air Quality, p. 5.1-19.

⁵ *Ibid.* 5.5 Noise, p. 5.5-9.

⁶ *Ibid.* 3.0 Project Description, p. 3-24.

⁷ *Ibid.* Appendices, Appendix B: Air Quality and Greenhouse Gas Emissions Assessment – CalEEMod Output File for Air Quality Emissions and Greenhouse Gas Emissions, PDF p. 165 of 2,391.

Cumulative Impacts During Operation

South Coast AQMD staff is primarily concerned with the cumulative air quality impacts resulting from increased concentrations of air toxics in the region. Pursuant to CEQA Guidelines Section 15126.2(a), which requires an analysis of direct, indirect, and cumulative impacts, South Coast AQMD has initiated a public process to develop additional guidance for evaluating cumulative air quality impacts from increased concentrations of air toxics for CEQA projects. As of the date on this comment letter, six public working group meetings (WGMs) have been held to develop this proposed cumulative impact policy. For general information on WGMs #1 through #6 and to gain familiarity with this developing policy, please visit South Coast AQMD's webpage at [https://www.aqmd.gov/home/rules-compliance/ceqa/ceqa-policy-development-\(new\)](https://www.aqmd.gov/home/rules-compliance/ceqa/ceqa-policy-development-(new)).

Based on the DEIR, the Proposed Project involves the construction of a 181,500 sq ft parcel delivery facility, which includes 163,350 sq ft of warehouse space on an approximately 31.6-acre site.⁸ The Environmental Setting section of the DEIR also notes that on July 1, 2024, the Lead Agency approved Project PR 2023-08, described as a "light industrial warehouse building at 3200 Nasa Street ... on a site currently developed as a surface parking lot."⁹ This approved project is located immediately west of the Proposed Project site. Upon review of the Notice of Exemption (NOE) filed for Project PR 2023-08, Staff notes that it consists of a 56,000 sq ft warehouse building, deemed categorically exempt from CEQA under a Class 32 Categorical Exemption (Section 15332).¹⁰ For context, Figure 1 provides a screenshot from the DEIR which illustrates the location of approved Project PR 2023-08 in relation to the Proposed Project site. Although Project PR 2023-08 is categorically exempt from CEQA, the combined development of approved Project PR 2023-08 and the Proposed Project would result in approximately 219,350 sq ft of warehouse space in the immediate area. Per CEQA Guidelines Section 15065(a)(3), a project may have "possible environmental effects that are individually limited but cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects."

Additionally, Staff's review of aerial photographs identified existing warehouses and/or light industrial facilities located to the north and west of the Proposed Project site. Primary regional access to the Proposed Project site and nearby facilities is provided, in part, by Imperial Highway/State Route (SR) 90, which lies approximately 1,150 feet south of the Proposed Project site and serves as a designated truck route. Furthermore, the intersection of Valencia Avenue and SR 90, which will be used by trucks serving the Proposed Project, is located approximately 390 feet from sensitive receptors, which includes a residential neighborhood.

Given the aforementioned, Staff recommends that, at minimum, the Lead Agency perform a qualitative analysis in the DEIR for the Proposed Project in order to disclose the potential cumulative impacts from air toxics in consideration by listing all surrounding past, present, and probable future projects. The Lead Agency is also encouraged to perform a more detailed and

⁸ DEIR. 1.0 Executive Summary, p. 1-1 & 1-2.

⁹ *Ibid.* 4.0 Environmental Setting, p. 4-9.

¹⁰ NOE for Plan Review No. 2023-08 & Tree Permit No. 2023-01: 3200 Nasa Street Warehouse. Accessed here: <https://ceqanet.opr.ca.gov/2024070174>

robust quantitative analysis of cumulative air toxics; this analysis should evaluate the potential health risk implications for sensitive receptors in the surrounding area and disclose the findings in the Final EIR.



DJT4 PARCEL DELIVERY FACILITY PROJECT

Figure 1: Screenshot from DEIR, 4.0 Environmental Setting, p. 4-11. Related Project No. 1 (Project PR 2023-08), a light industrial warehouse building of 56,000 sq ft adjacent to the Proposed Project, was approved by the City of Brea on July 1, 2024

Unrealistic Baseline Assumptions

According to the DEIR, the CEQA baseline for the Proposed Project is defined as the existing office building on the site, assumed to be occupied by Bank of America.¹¹ Bank of America vacated the building in December 2022, several months prior to the Lead Agency filing the Notice of Preparation (NOP) on July 13, 2023.¹² According to CEQA Guidelines Section 15125(a), “an EIR [Environmental Impact Report] must include a description of the physical environmental conditions in the vicinity of the project. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant... Generally, the lead agency should describe physical environmental conditions as they exist at the time the notice of preparation is published...” The DEIR argues that because the building could be reoccupied at any time without discretionary approval, it is reasonable to assume continued operation by Bank of America for the Proposed Project baseline.¹³ However, this baseline assumption is inconsistent with CEQA Guidelines, as the building was unoccupied at the time of the NOP filing.

Relying on an incorrect and unrealistic baseline compromises the accuracy of the DEIR’s air quality analysis, including the operational regional significance analysis, localized significance analysis, and greenhouse gas emissions assessments. For example, the incorrect baseline includes trips from the prior Bank of America office use, which is 4,818 daily vehicle trips.¹⁴ The Proposed Project is expected to generate 2,098 daily vehicle trips. The DEIR therefor states that the Net Daily Trips is -2,720. For context, Figure 2 provides a screenshot from the DEIR of how the net daily trips was arrived at for the Proposed Project. This results in an underestimation of the Proposed Project’s estimated air quality emissions.^{15, 16, 17} To ensure the accuracy of the air quality analysis, Staff recommends the baseline condition be recalculated to reflect the building’s unoccupied status at the time of the NOP filing.

¹¹ DEIR. 5.8 Transportation, p. 5.8-17.

¹² *Ibid.* 1.0 Executive Summary, p. 1-4.

¹³ *Ibid.* 5.8 Transportation, p. 5.8-17.

¹⁴ *Ibid.* 5.8 Transportation, Table 5.8-1 Daily Trips Generated by Proposed Use, p. 5.8-11.

¹⁵ *Ibid.* 5.1 Air Quality, Table 5.1-7 Operations-Related Emissions (Regional Significance Analysis), p. 5.1-33.

¹⁶ *Ibid.* 5.1 Air Quality, Table 5.1-9 Operations-Related Emissions (Localized Significance Analysis), p. 5.1-37.

¹⁷ *Ibid.* 5.3 Greenhouse Gas Emissions, Table 5.3-3 Operations-Related GHG Emissions, p. 5.3-24.

**Table 5.8-1
Daily Trips Generated by Proposed Use**

Vehicle Type	Number of Vehicles ¹	Daily Trips
Existing Baseline Condition (Bank of America)		
Employee Personal Vehicles	1,447	4,818
DJT4 Parcel Delivery Facility		
Employee Personal Vehicles ²	576	1,152
Delivery Vans ³	345	690
Flex Private Carrier Vehicles ⁴	97	194
Line-Haul Trucks	31	62
<i>Total</i>	1,049	2,098
Net Daily Trips		-2,720
Notes:		
1. Based on information provided by the Project Applicant.		
2. Associates, managers, dispatchers, and delivery van drivers would drive their personal vehicles to and from the Project Site.		
3. Delivery van drivers would drive company vans to delivery locations then back to the Project Site at the end of their work shift.		
4. Flex drivers would drive personal vehicles to the Project Site to pick up packages for delivery but would not return to the Project Site.		
Source: NV5 Engineers & Consultants. September 3, 2024. Vehicle Miles Traveled (VMT) Analysis for Brea Delivery Station. Table 1.		

Figure 2: Screenshot from DEIR, 5.8 Transportation, Table 5.8-1, p. 5.8-11. Incorrect baseline assumes office building is currently in operation and therefore currently generates 4,818 daily vehicle trips

Warehouse Cold Storage Land Use and the Associated Emissions from Transport Refrigeration Units (TRU)

The project description in the DEIR does not specify whether the Proposed Project includes allocating warehouse land for cold storage. Cold storage warehouses typically utilize more trucks and trailers equipped with TRUs compared to those without cold storage. Therefore, it is recommended that the Lead Agency revise the project description in the Final EIR to clarify if cold storage would be a part of the Proposed Project, and additionally, the Final EIR should provide an estimate for the number of TRU trucks and trailers that would be involved in the operation of the warehouses with cold storage. If TRUs are planned to be used, the Lead Agency should also update the emissions calculations in the Final EIR to include the emissions from the TRUs in addition to the those from truck operation.

South Coast AQMD Air Permits and Role as a Responsible Agency

If implementation of the Proposed Project would require the use of new stationary and portable sources, including but not limited to emergency generators, fire water pumps, boilers, spray booths, etc., air permits from South Coast AQMD will be required and the role of South Coast AQMD would change from a Commenting Agency to a Responsible Agency under CEQA. In addition, if South Coast AQMD is identified as a Responsible Agency, per CEQA Guidelines Section 15086, the Lead Agency is required to consult with South Coast AQMD. Furthermore, CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency,

including making a decision on the adequacy of the CEQA document for use as part of evaluating the applications for air permits. For these reasons, the Final EIR should include a discussion about any new stationary and portable equipment requiring South Coast AQMD air permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project.

The Final EIR should also include calculations and analyses for construction and operation emissions for the new stationary and portable sources, as this information will also be relied upon as the basis for the permit conditions and emission limits for the air permit(s). Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions regarding what types of equipment would require air permits. For more general information on permits, please visit South Coast AQMD's webpage at: <http://www.aqmd.gov/home/permits>.

Conclusion

As set forth in California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a-b), the Lead Agency shall evaluate comments from public agencies on the environmental issues and prepare a written response at least 10 days prior to certifying the Final EIR. As such, please provide South Coast AQMD written responses to all comments contained herein at least 10 days prior to the certification of the Final EIR. In addition, as provided by CEQA Guidelines Section 15088(c), if the Lead Agency's position is at variance with recommendations provided in this comment letter, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided.

Thank you for the opportunity to provide comments. South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Evelyn Aguilar, Air Quality Specialist, at eaguilar@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

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SW:EA

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