

Review of SCAQMD Staff Comments and Testimony on Warehouse Projects

**Southern California Leadership Council
Goods Movement/Warehousing Working Group
March 14, 2014**

Four Key Factors for SCAQMD Staff CEQA Commenting

1. Potential for Air Quality/Public Health Impacts
 - Project has potential for high emissions or health risk
2. Application of CEQA Guidelines
 - Appropriate CEQA document, baseline, etc.
3. Air Quality Analysis
 - Appropriate emission calculations, emission factors, trip length, truck trip rate, fleet mix, etc.
 - Complete air quality analysis – health risk, localized criteria pollutant, etc.
4. Mitigation
 - Additional opportunity for mitigation to reduce significant impacts

Additional Considerations for SCAQMD Staff Commenting

- Comments not adequately addressed in Final CEQA document
- Environmental justice area
- Availability of staff resources

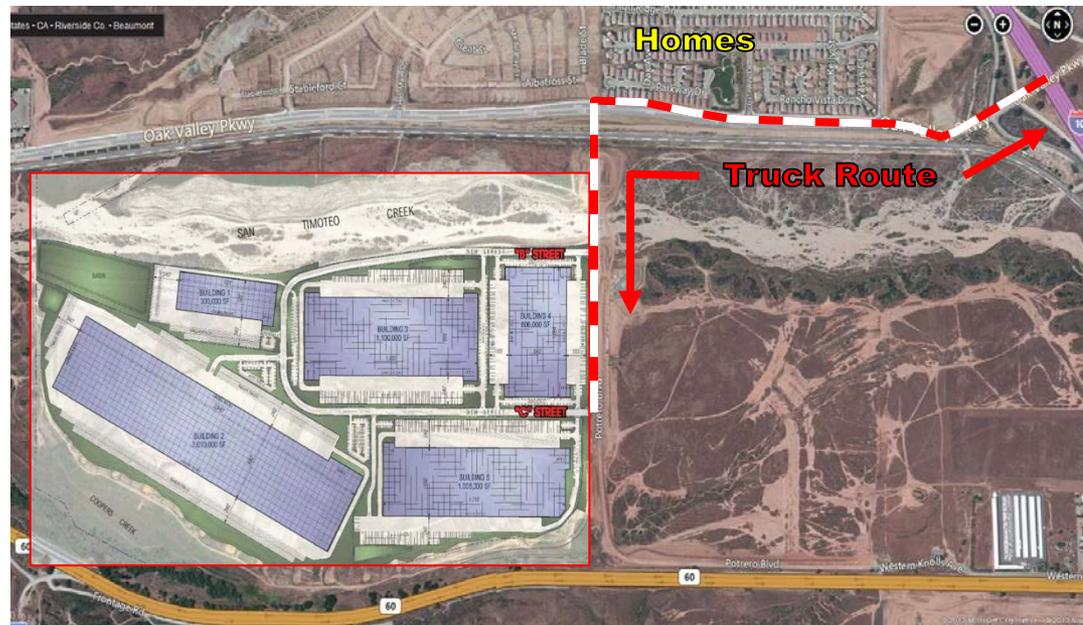
Examples of Warehouse Projects SCAQMD Staff Testified and Key Areas of Concern

Project Jurisdiction	Air Quality/ Public Health Impact	Application of CEQA Guidelines	Air Quality Analysis	Mitigation
<u>Heartland Specific Plan</u> Beaumont	Potentially High	Concerns	Deficiencies	None
<u>World Logistic Center</u> Moreno Valley	Very High	--	--	Substantial
<u>March Business Center-</u> Moreno Valley	High and Cumulative Concerns	--	--	Could be Improved
<u>Banning Business Park</u> Banning	--	--	--	Substantial

* Received CEQA document day before the hearing. Submitted letter day of hearing.

Heartland Specific Plan Background

- Proposed Project
 - 5 million square foot warehouse project in Beaumont
 - Addendum to residential development
- SCAQMD staff submitted comment letter for Addendum
- SCAQMD staff testified to the City Council



Heartland Specific Plan

Key Concerns

- Application of CEQA Guidelines
 - Prepared an Addendum – No public comment required under CEQA for Addendum
 - CEQA document relied on 20 year old EIR – for a mostly residential development
 - Concerned citizen contacted SCAQMD one day prior to First City Council Hearing
 - Inappropriate CEQA Baseline led to incorrect CEQA document - assumed full build out of existing plan as baseline
- Potential for Air Quality/Public Health Impacts
 - 5 million square foot warehouse, third largest at this time
 - Potential impacts from trucks not analyzed

Heartland Specific Plan

Key Concerns (*Continued*)

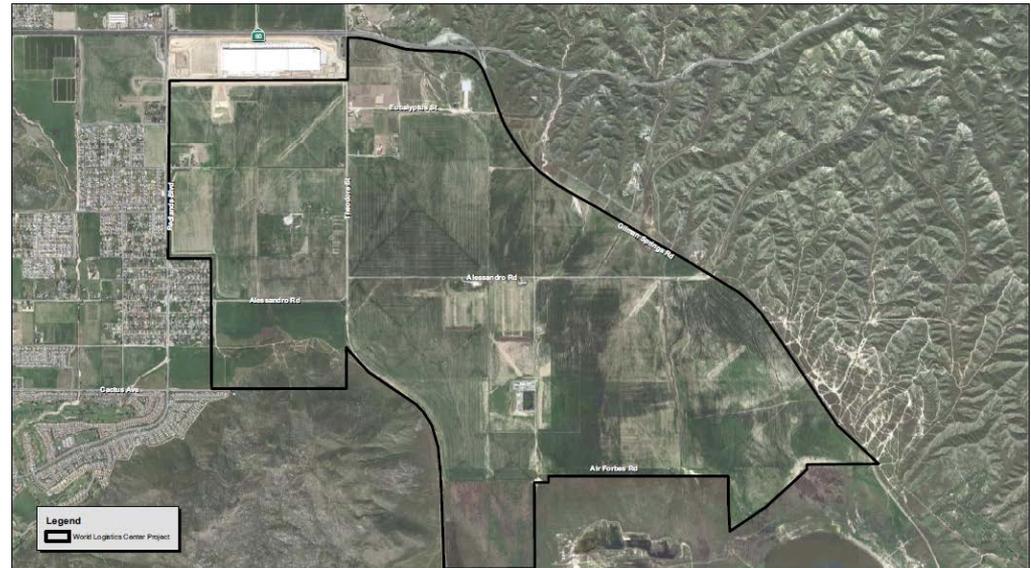
- Air Quality Analysis
 - 9 mile truck trip length (typically 40 miles)
 - Only 4% heavy duty diesel trucks assumed in fleet mix (typically 20% diesel trucks)
 - No risk assessment to estimate health risk from trucks (risk assessment standard on warehouse projects)
 - No analysis of localized criteria pollutant analysis (localized analysis standard on warehouse projects)
- Mitigation
 - No mitigation provided for diesel trucks

Heartland Specific Plan Project Outcome

- Project denied by City Council – concerns regarding
 - CEQA process
 - Air quality
 - Quality of warehousing jobs
 - Zoning

World Logistics Center Background

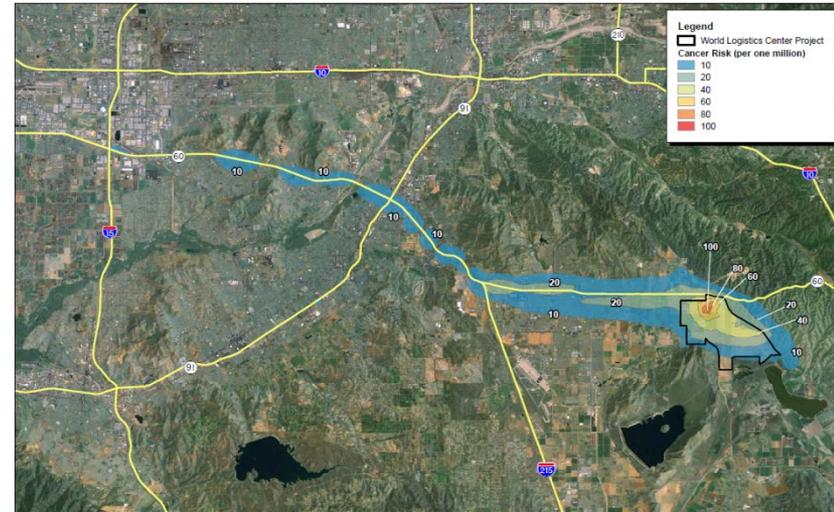
- Proposed Project
 - 41.6 million square foot of warehousing in a specific plan
 - Final EIR not yet released
- SCAQMD staff submitted comment letters on Specific Plan, NOP, and DEIR
- SCAQMD staff testified at Scoping Meeting
- Final EIR being completed



World Logistics Center Key Concerns

- Air Quality/Public Health Impact

- Significant health risk affects large area (MICR 77 in a million)
- Very high NOx: 3,059 lb/day

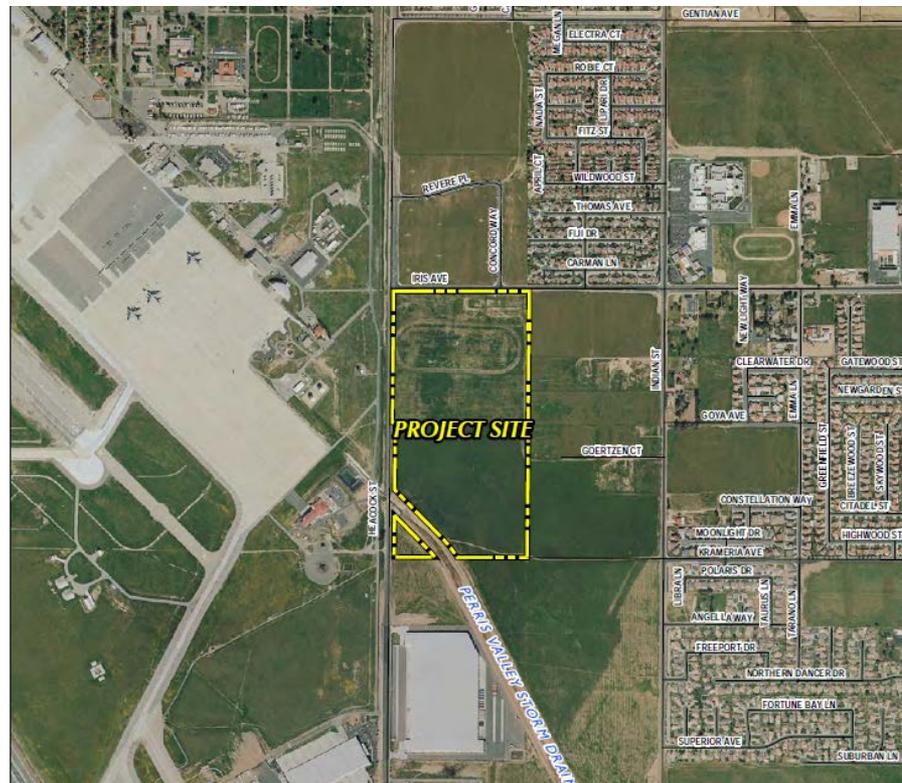


- Mitigation

- DEIR includes mitigation below, yet still yields high impacts:
 - 100% 2010 standard trucks
 - Onsite alternative fueling station
 - Onsite supporting businesses (food, fuel, etc.)
 - Signage for truck routes and anti-idling
 - Onsite diesel minimization (100% alt. fuel for onsite equipment, staff training, data logging)

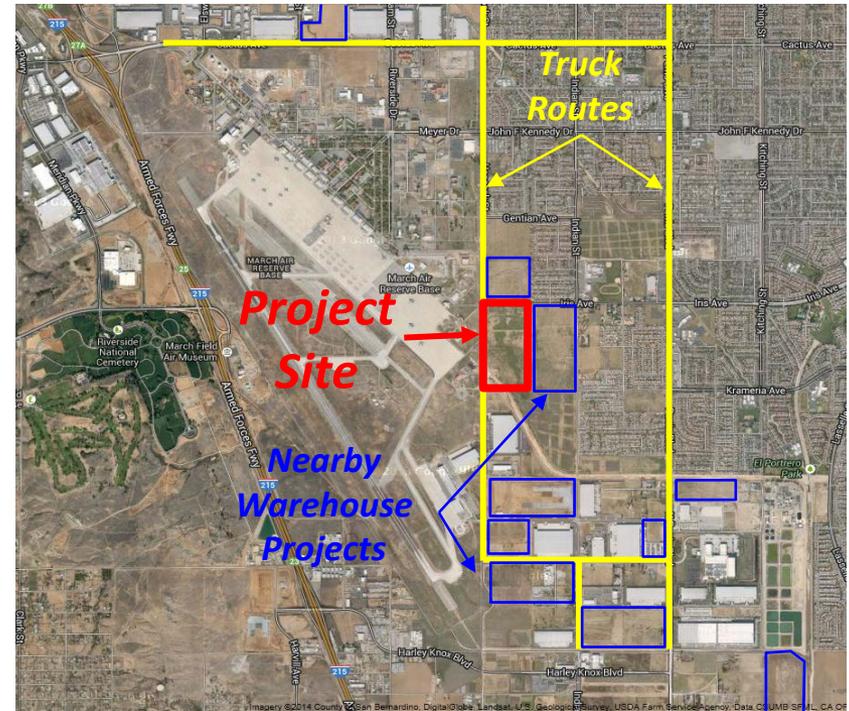
March Business Center Background

- Proposed Project
 - 1.5 million square foot warehouse
- SCAQMD staff testified at Planning Commission and City Council



March Business Center Key Concerns

- Air Quality/Public Health Impact
 - High NOx impact: 708 lbs/day
 - Less than significant project risk: 4 in a million
 - Cumulative risks not analyzed: At least 10 other nearby warehouse projects will use same truck routes



March Business Center

Key Concerns and Project Outcome

- Mitigation
 - SCAQMD staff recommendations - not incorporated
 - 2010 trucks fleet or phase-in schedule for 2010 truck fleet
 - Alternative fueling infrastructure
 - Implement advanced truck technology program
 - Commit to require tenants to apply for funding to retrofit and replace older trucks
 - Alternative fueled hostlers
- Project Outcome
 - Project approved by lead agency
 - Project litigated by community groups (Air quality one of several issues)

Banning Business Park Background

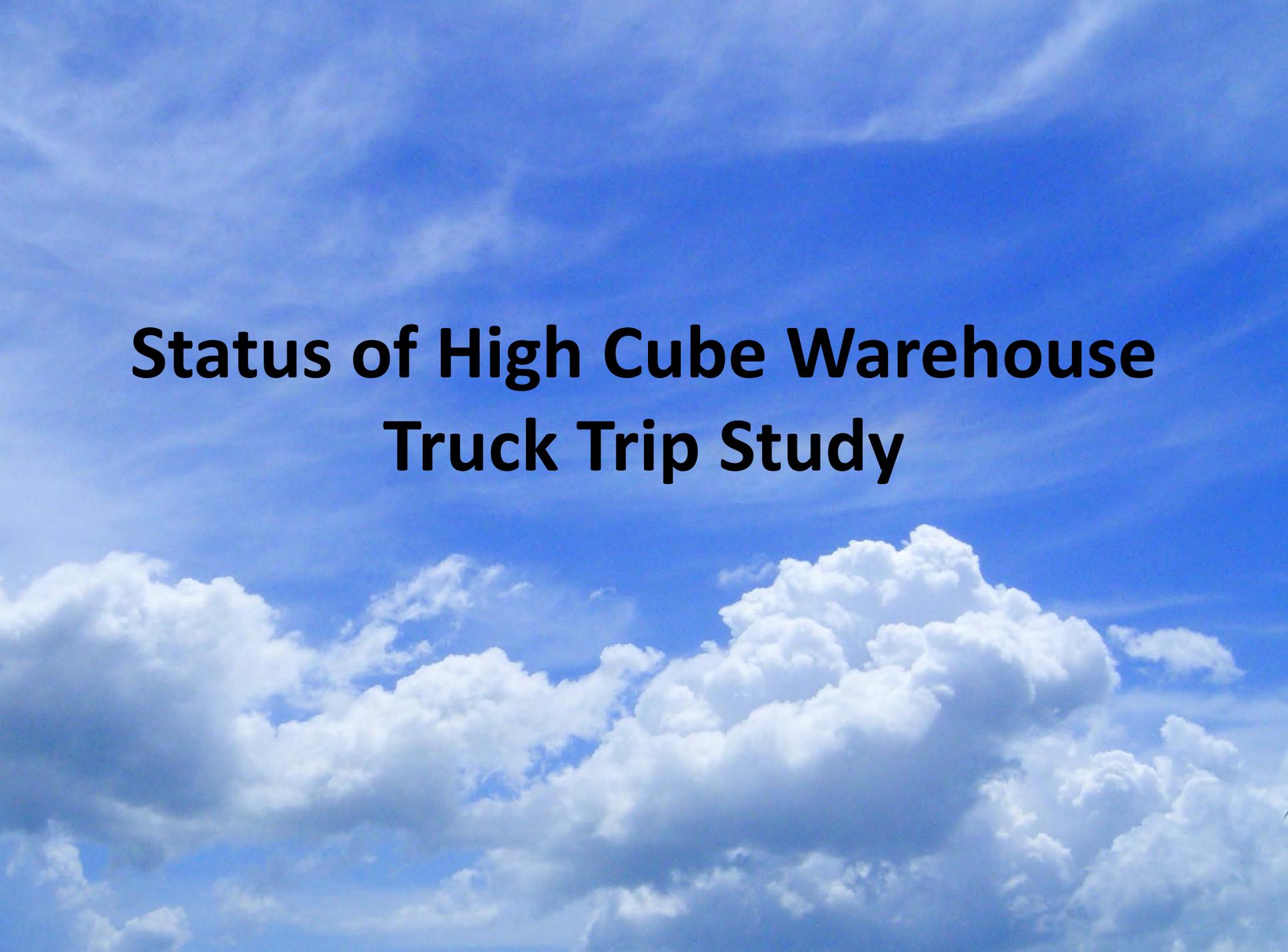
- Proposed Project
 - 1.2 Million square feet in 12 buildings
 - Mitigated Negative Declaration certified by lead agency
 - Draft MND assumed <2% heavy duty trucks, but traffic study assumed 12% heavy duty trucks
 - 12% heavy duty trucks would yield significant air quality impacts
 - SCAQMD staff recommended 2010 truck fleet or EIR



Banning Business Park

Key Concerns and Project Outcome

- Mitigation Measure
 - Lead agency/applicant committed to 2010 truck fleet
 - First warehouse project that SCAQMD staff was aware of that committed to 2010 truck fleet
- Project Outcome
 - SCAQMD staff testified to City Council acknowledging commitment for a 2010 truck fleet
 - Project approved by City Council

The background of the slide is a bright blue sky filled with numerous white, puffy cumulus clouds. The clouds are scattered across the frame, with some larger, more prominent ones in the lower half and smaller, wispy ones in the upper half. The overall scene is bright and clear.

Status of High Cube Warehouse Truck Trip Study

SCAQMD High Cube Warehouse Truck Trip Study

- SCAQMD staff overseeing study on high cube warehouse truck trip rates for use in CEQA air quality analyses
- 13 stakeholder meetings to date
- Data collection completed by traffic engineers
 - Business survey
 - Trip counts
- Data analysis underway by UC Riverside
- Preliminary observations pending statistical verification
 - Warehouses with refrigerated trucks
 - E-commerce related warehouses
 - Overall trip rate
 - Truck trip rate
 - 95% confidence significant factor
- Materials available online
 - <http://www.aqmd.gov/ceqa/Warehouse/Warehouse.html>

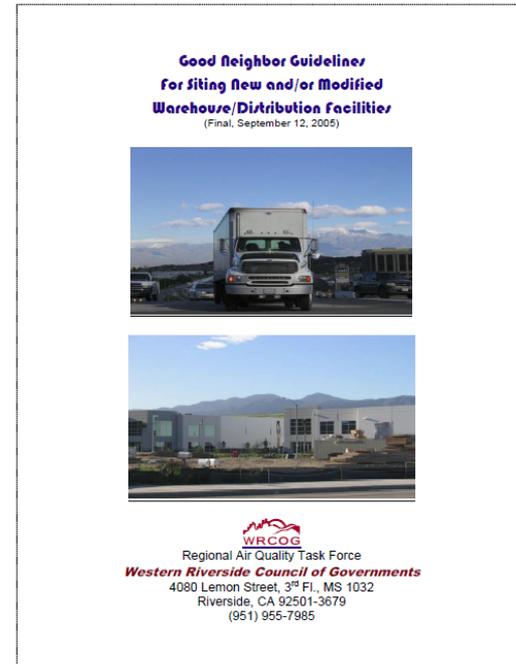
A blue sky with scattered white clouds. The clouds are fluffy and white, set against a clear blue background. The text is centered in the upper half of the image.

**Western Riverside COG
“Good Neighbor” Guidelines**

Goals of WRCOG

“Good Neighbor” Guidelines

- Guidelines developed in 2005 to:
 - *“Provide local governments with specific strategies that can be considered and implemented to minimize potential diesel impacts from new warehouse and distribution centers”*
 - *“Educate existing warehouse and distribution centers about strategies that can be implemented to minimize potential diesel impacts from their opera*
- Guidelines available online:
 - http://www.wrcog.cog.ca.us/uploads/media_items/good-neighbor-policy.original.pdf



SCAQMD CEQA Comments Consistent with WRCOG Guidelines

- Recommended mitigation in WRCOG Guidelines:
 - Buffer zones
 - Encourage fleet owners to replace existing diesel fleets with “new model vehicles and/or cleaner technologies, such as electric or compressed natural gas”
 - Reduce diesel trucking activity outside of warehouses
 - Reduce onsite idling
 - Place clearly marked truck routes away from sensitive receptors
 - Encourage alternative fueling infrastructure
 - Educate workers and truckers about impacts from diesel and available resources to reduce impacts