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Review of the Draft Environmental Impact Report (Draft EIR) for the Proposed Oakmont II Ramona Expressway Development Project

The South Coast Air Quality Management District (SCAQMD) 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 either a Revised Draft or Final Environmental Impact Report (Final EIR) as appropriate.

The SCAQMD staff has reviewed the Draft EIR for the proposed Oakmont II Ramona Expressway Development Project and has identified several issues off concern associated primarily with the health risk assessment. In particular it appears that the cancer risks from the proposed project may be underestimated. If the lead agency revises the health risk assessment based on the enclosed comments and the health risk assessment results in substantially greater significant cancer risk impacts or non-cancer health risks are concluded to be significant then the lead agency should consider additional mitigation to reduce air quality impacts from the operational phase of the project.

SCAQMD staff appreciates the fact that the lead agency allowed additional time in which to submit comments. Pursuant to Public Resources Code Section 21092.5, please 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 Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,

Steve Smith, Ph.D.
Program Supervisor – CEQA Section
Planning, Rule Development & Area Sources

Attachment

SS:DG

SBC090602-02
Control Number

Regional Construction and Operational Air Quality Analysis

1. In Section 6.0 (Short-Term Construction Impacts) of the Air Quality Analysis for the Draft EIR the lead agency assesses the regional air quality impacts from the proposed construction activities. The lead agency summarizes the project's unmitigated construction emissions during the building construction phase of the project in Table N (Air Emissions Prior to Mitigation During Building Construction Activities). Based on staff's review of the URBEMIS output sheets in Appendix A of the Air Quality Analysis, the lead agency lowered the vendor trip rate of 0.38 per 1,000 square feet to 0.11 trips per 1,000 square feet. On page 31 of the Air Quality Analysis the lead agency explains that the lower vendor trip rate was used because an economy of scale factor was assumed for the construction of this project.

   Based on similar warehouse projects reviewed by the SCAQMD, the standard trip rate of 0.38 trips per 1,000 square feet is applied to warehouse projects. The rationale for this trip rate is that while the type and capacity of vehicles traveling to and from the project site hauling construction materials may be different the trip rate remains the same. Thus, a vendor trip rate of less than 0.38 trips per 1,000 square feet would not be representative of the haul truck activities at these types of construction project sites and, therefore could lead to an underestimation of construction emissions. Therefore, SCAQMD staff requests that the lead agency recalculate the building construction emissions using actual vehicle trip characteristics based on the project's size.

   Once the lead agency has recalculated the building construction emissions to reflect a more appropriate vendor trip rate the SCAQMD staff requests that the lead agency revise Table N (Air Emissions Prior to Mitigation During Building Construction Activities) and Table O (Mitigated Air Emissions During Building Construction Activities) of the Air Quality Analysis for the Final EIR quantifying peak daily construction air quality impacts and summarizing all emissions from the planned construction activities including NOx, SOx, CO, PM10, PM 2.5 and VOC.

2. In Section 7.1 (Potential Operations-Related Regional Air Quality Impacts) of the Air Quality Analysis for the Draft EIR the lead agency assesses the regional air quality impacts from the proposed operational activities. The lead agency summarizes the project's unmitigated operational emissions on page 40 in Tables S (Operational Air Pollution Emissions). Based on staff's review of the URBEMIS output sheets in Appendix C of the Air Quality Impact Analysis, the lead agency used the commercial urban trip length and commercial rural trip length of 15 miles categorized as customer based trips in the URBEMIS 2007 Model.

   Based on similar warehouse projects reviewed by the SCAQMD, the standard trip length that is applied to warehouse projects is 40 miles per one-way trip. The rationale for this trip length is that most vehicle trips to and from warehouse facilities are made by heavy-duty trucks hauling consumer goods, often from the Ports of Long Beach and Los Angeles to destinations outside of California. Thus, a commercial trip length of 15 miles or less would not be representative of haul truck activities at these types of facilities and, therefore could lead to an underestimation of on-road mobile source emissions. Therefore, SCAQMD staff

recommends that the lead agency recalculate the mobile source emissions using actual fleet characteristics based on the project's anticipated warehouse operations. The mobile source emissions calculation should account for the project's applicable trip lengths (miles per one-way trip) and also reflect the actual percentage of the truck fleet creating mobile source emissions within the South Coast Air Basin and up to the California border.

Once the lead agency has recalculated the mobile source emissions to reflect a more appropriate trip length the SCAQMD staff requests that the lead agency revise Table S (Operational Air Pollution Emissions) of the Air Quality Analysis in the Final EIR quantifying peak daily air quality impacts and summarizing all emissions from the planned operational activities including NOx, SOx, CO, PM10, PM 2.5 and VOC.

Localized Construction and Operational Air Quality Analysis

Health Risk Assessment

3. Idling emissions were estimated based on the assumption that trucks would idle only five minutes on site per trip. State regulations limit idling to five minutes per idling event. Since trucks may idle while waiting for an open dock, at the dock before loading/unloading, and at the dock before leaving, SCAQMD staff recommends that a default idling time of 15 minutes per trip be used in the Final Health Risk Assessment (HRA) unless a mitigation measure is added that limits idling to five minutes or less.

4. Page 7 states that TRU emissions were estimated based on a running time of 30 minutes per day and that 25 percent of the trucks would have TRUs. However, it is not clear how the emission rates in Table C were developed. Table C includes a column labeled percent running time that is not defined. The emissions calculations or methodologies to derive the emission rates in Table C should be clearly shown in the Final HRA.

5. Table D on page 8 presents on-site roadway line source statistics. It is not clear, however, how the emission rates in Table D were developed. Based on the data presented, the emission rates should be those presented in column five below instead of the values presented in Table D, which are shown in column six below. The revised emissions calculations and revised results should clearly be shown in the Final HRA.

Truck Type	Trips, day	EF, g/mile	Length, m	Emission Rate, g/s	Table D Emission Rate, g/s
Heavy-duty	50	1.09	159	6.23E-05	Not Shown in HRA
Medium-duty	16	0.076	159	1.39E-06	Not Shown in HRA
Total Truck Emission Rate				6.37E-05	2.96E-06

Emission rate, g/s = (Trips per day x EF, g/mile x Length, m)/(1,609 m/mile)/(24 hour/day)/(3,600 sec/hr)

6. Table E on page 12 of the HRA presents concentrations that are lower than those presented in the output (Appendix B of the HRA). The following table presents the concentrations provided in Table E and the concentrations in the 2011 output files in Appendix B of the

HRA. In some cases the difference between the two concentrations is relatively substantial. Further, the HRA states on page 12 that the output for 2023 was not included in the HRA, so SCAQMD staff could not verify the 2023 concentrations in Table E. Since the concentrations appear to be underestimated in Table E, it is likely that the health risk results are also under reported. This discrepancy should be corrected in the Final HRA.

Receptor No.	X m	Y m	2011 Table E ug/m3	2011 Output File ug/m3
1	292.36	1909.26	0.005	0.01248
2	296.44	1825.73	0.009	0.02055
3	295.23	1777.48	0.010	0.02586
4	295.23	1738.74	0.011	0.03312
5	294.5	1672.87	0.014	0.04476
6	293.05	1620.32	0.018	0.04893
7	163.31	1583.04	0.008	0.01840
8	162.44	1550.99	0.008	0.01865
9	162.88	1499.23	0.009	0.01903
10	161.68	1421.31	0.009	0.01909
11	161.59	1323.89	0.009	0.01801

10. The HRA states that the Traffic Analysis (Kunzman, February 13, 2009) predicts 1,222 passenger car trips and 904 truck trips per day. It is not clear if this matches the truck trip rate presented in the traffic report included in the Draft EIR. Table 1 in the Traffic Analysis states that 3,477 daily trips would be added from the project., and Table 2 presents 1,023 daily PCE truck trips (actual truck trips are not presented) from the high-cube warehousing and Table 3 presents 86 truck trips. This should be clarified in the Final HRA.

Regional and Localized Construction and Operational Mitigation

11. In the event that the lead agency's revised regional construction and operational emissions analysis requested in comments #1 and #2 demonstrates that any criteria pollutant emissions create new significant adverse impacts or make existing significant adverse impacts substantially greater, the SCAQMD recommends that the lead agency consider adding the following mitigation measures to further reduce air quality impacts from the construction phase of the project, if feasible:

NOx:

- Prohibit vehicle and engine idling in excess of five minutes and ensure that all off-road equipment is compliant with the California Air Resources Board's (CARB) in-use off-road diesel vehicle regulation and SCAQMD Rule 2449;
- Require construction parking to be configured such that traffic interference is minimized;
- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site;

- Schedule construction activities that affect traffic flow on the arterial system to off-peak hours to the extent practicable;
- Reroute construction trucks away from congested streets or sensitive receptor areas;
- Improve traffic flow by signal synchronization;
- Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow;
- Require the use of alternative fueled off-road construction equipment;
- Require the use of electricity from power poles rather than temporary diesel or gasoline power generators;
- Develop park and ride programs;
- Electrify service equipment facility;
- Electrify auxiliary power units;
- Restrict operation to "clean" trucks, such as a 2007 or newer model year or 2010 compliant vehicle;
- Require all vehicles and equipment to be properly tuned and maintained according to manufacturers' specifications; and
- Provide onsite services to minimize truck traffic in or near residential areas, including, but not limited to, the following services: meal or cafeteria service, automated teller machines.

Fugitive Dust:

- Require all trucks hauling dirt, sand, soil, or other loose materials to be covered;
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation; and
- When sweeping streets to remove visible soil materials use SCAQMD Rule 1186 and 1186.1 certified street sweepers or roadway washing trucks.

VOC

- Construct or build with materials that do not require painting; and
- Require the use of pre-painted construction materials.

Additional construction and operational mitigation measure suggestions can be found at http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html.

12. In the event that the lead agency revises the health risk assessment and the revised health risk assessment results in substantially greater significant cancer risk impacts or non-cancer health risks that are concluded to be significant, then the SCAQMD recommends that the lead agency consider adding the following mitigation measures to further reduce air quality impacts from the operation phase of the project, if feasible:

- Avoid siting new sensitive land uses within 1,000 feet of the warehouse/distribution center;
- Design the warehouse/distribution center such that entrances and exits are such that trucks are not traversing past neighbors or other sensitive receptors;

- Design the warehouse/distribution center such that any check-in point for trucks is well inside the facility property to ensure that there are no trucks queuing outside of the facility;
- Develop, adopt and enforce truck routes both in an out of city and in and out of facilities;
- Establish area(s) within the facility for repair needs;
- Have truck routes clearly marked with trailblazer signs, so trucks will not enter residential areas;
- Identify or develop secure locations outside of residential neighborhoods where truckers that live in the community can park their truck, such as a Park & Ride;
- Provide food options, fueling, truck repair and or convenience store on-site to minimize the need for trucks to traverse through residential neighborhoods;
- Re-route truck traffic by adding direct off-ramps for the truck or by restricting truck traffic on certain sensitive routes;
- Improve traffic flow by signal synchronization;
- Require or provide incentives for particulate traps that meet CARB certified level 3 requirements;
- Electrify service equipment at facility; and
- Conduct air quality monitoring at sensitive receptors.