



South Coast Air Quality Management District

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Mitigated Negative Declaration (MND) for the Proposed Center Street Industrial Development (DAP-001-446)

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 236,512-square-foot (sf) warehouse with unknown occupants on an approximately 9.8-acre site (Proposed Project). The MND estimates approximately 415 total vehicle trips, including approximately 158 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 3.2 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 Jack Cheng, Air Quality Specialist, CEQA IGR Section, at (909) 396-2448, or Lijin Sun, Program Supervisor, CEQA IGR Section, at (909) 396-3308 if you have any questions.

¹ MND. Table L – Project Trip Generation.

² MND. Appendix B-3 – Health Risk Assessment.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment
LS:JC
SBC171205-01
Control Number

ATTACHMENT

Health Risk Assessment (HRA)

1. The Lead Agency used the “highest of T7-Tractor, T7-NOOS, and T7-Public trucks³” to estimate Heavy Heavy-Duty (HHD) diesel truck emissions. EMFAC2014 includes 16 T7 HHD truck categories with varying emission rates. Since the Proposed Project is a warehouse project with estimated 158 daily diesel truck trips, SCAQMD staff recommends using T7 HHD truck categories to estimate emissions from HHD diesel trucks or providing additional information to justify the use of T7-Tractor, T7-NOOS, and T7-Public trucks categories in the Final EIR.
2. The HRA assumed that only 4+ axle trucks would idle and smaller 2- and 3-axle trucks would not idle⁴. Since the tenant is unknown, SCAQMD staff recommends including idling emissions from smaller trucks to ensure the most conservative estimate of truck emissions and air quality impacts are disclosed in the Final MND.
3. Onsite truck idling (IDLE01-IDLE12) was modeled as 12 point sources. On-site idling sources should span the entire docking area. SCAQMD staff recommends that the Lead Agency revise the HRA using a volume source that spans the entire docking area to ensure that impacts from onsite truck idling are properly analyzed.
4. The Lead Agency used a flagpole receptor height of 2 meters. The SCAQMD modeling guidance advises that all receptors should be set to a height of 0.0 meters (default), so that ground-level concentrations are analyzed.⁵ As such, SCAQMD staff recommends that the Lead Agency revise the HRA and use the default 0.0 meter flagpole receptor height or provide a rationale to justify the use of 2 meters.

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

5. 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.

³ Appendix B-3 – Health Risk Assessment.

⁴ *Ibid.*

⁵ South Coast Air Quality Management District. <http://www.aqmd.gov/home/library/air-quality-data-studies/meteorological-data/modeling-guidance>.

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/00000003422/California-Clean-Truck-and-Trailer-Update.pdf> (See slide #23).

- 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 (158 trucks per day as analyzed in the MND). If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the project 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 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.

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

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

- 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.