



South Coast Air Quality Management District

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SENT VIA USPS AND E-MAIL:

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Recirculated Draft Environmental Impact Report (RDEIR) for the Proposed San Gorgonio Crossings Project ("Proposed Project") (SCH No.: 2014011009)

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 EIR.

SCAQMD staff understands that one of the project objectives is to reduce air pollution by providing local employment and economic opportunities and by locating the proposed project near existing roadways and freeway¹. SCAQMD staff supports the County of Riverside's (County or Lead Agency) commitment to reducing air pollution while achieving economic prosperity.

On March 3, 2017, the SCAQMD's Governing Board adopted the 2016 Air Quality Management Plan (2016 AQMP), which was later approved by the California Air Resources Board of Directors on March 23rd. The 2016 AQMP² is a regional blueprint for achieving air quality standards and healthful air in the South Coast Air Basin (Basin). Built upon the progress in implementing the 2007 and 2012 AQMPs, the 2016 AQMP provides a regional perspective on air quality and lays out the challenges facing the Basin. The most significant air quality challenge in the Basin is to achieve an additional 45 percent reduction in nitrogen oxide (NOx) emissions in 2023 and an additional 55 percent NOx reduction beyond 2031 levels for ozone attainment.

Project Background

The Lead Agency circulated the DEIR for the proposed project for a 45-day public review and comment period on November 29, 2016³. SCAQMD staff provided timely comments on the DEIR on January 18, 2017⁴. After a review of the comments on the DEIR, the Lead Agency elected to recirculate the DEIR in its entirety pursuant to CEQA Guidelines Section 15088.5

¹ RDEIR. Section 2, *Project Description*. Page 2-24.

² South Coast Air Quality Management District. March 3, 2017. *2016 Air Quality Management Plan*. Accessed at: <http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan>.

³ RDEIR. Section 1, *Introduction*. Page 1-1.

⁴ SCAQMD staff comments on the DEIR. January 18, 2017. Accessed at: <http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2017/DEIRsangorgcross011817.pdf>.

(f)(1)⁵. SCAQMD staff understands that although the comments submitted on the DEIR will be part of the overall administrative record for the proposed project, the Lead Agency will prepare proposed response to comments on this RDEIR in accordance with the California Public Resources Section 21092.5 and CEQA Guidelines Section 15088.

Project Description

The Lead Agency proposes to construct two industrial buildings totaling 1,823,760 square feet (sf) within the 140.23-acre portion of 229 acres. The remaining 84.8 acres would be preserved for open space. Building 1 will have 136 dock doors, and Building 2 will have 170 dock doors. Both buildings will be operated for 24 hours a day and seven days a week. Most of the areas surrounding the proposed project are undeveloped with four single-family residences approximately 290 to 700 feet to the north, a planned community development with 560 residential units at buildout to the south, the Interstate 10 Freeway (I-10) approximately 0.35 miles to the southwest, and a mobile home park approximately 0.26 miles to the west⁶. The proposed project will generate approximately 3,126 total daily vehicle trips, including 1,191 diesel trucks⁷. Construction is planned for one single phase starting in 2017 with building occupancy planned approximately in late 2017⁸.

Air Quality and Health Risk Assessment (HRA) Analyses

In the Air Quality Section, the Lead Agency quantified the proposed project's construction and operational emissions and compared them to SCAQMD's regional and localized air quality CEQA significance thresholds. The Lead Agency found that regional and localized construction emissions would be less than significant after incorporating construction mitigation measures MM AQ-1a through MM AQ-1h⁹. However, the proposed project's mitigated operational emissions would continue to exceed SCAQMD's regional thresholds for ROG and NOx and would be significant and unavoidable after mitigation¹⁰. Additionally, the Lead Agency performed a HRA and found that the Maximum Cancer Risk is 6.0 in one million which is below SCAQMD's CEQA significance threshold of 10 in one million¹¹.

SCAQMD staff has concerns about the HRA analysis in the RDEIR. The analysis utilized assumptions which have likely led to an under-estimation of the proposed project's health risk impacts. Details are included in the attachment. Moreover, as described in the 2016 AQMP, achieving NOx emission reductions in a timely manner is critical to attaining the National Ambient Air Quality Standard (NAAQS) for ozone before the 2023 and 2031 deadlines. SCAQMD is committed to attaining the ozone NAAQS as expeditiously as practicable, and the proposed project plays an important role in supporting SCAQMD's commitment. As such, the attachment includes a discussion of the existing construction mitigation measures for air quality and additional operational mitigation measures to further reduce NOx emissions. Please see the attachment for more information.

⁵ RDEIR. Section 1, *Introduction*. Page 1-1.

⁶ RDEIR. Section 2.0, *Project Description*. Pages 2-2 and 2-21.

⁷ *Ibid.* Section 3.16, *Transportation and Traffic*. Page 3.16-22.

⁸ *Ibid.* Page 2-20.

⁹ *Ibid.* Section 3.3, *Air Quality*. Pages 3.3-37 to 39 and Page 3.3-52.

¹⁰ *Ibid.* Page 3.3-53.

¹¹ *Ibid.* Page 3.3-59.

Pursuant to the California Public Resources Code Section 21092.5 and the CEQA Guidelines Section 15088, SCAQMD staff requests that the Lead Agency provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final EIR.

SCAQMD staff is available to work with the Lead Agency to address the issues raised in this letter and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist, CEQA-IGR Section, at (909) 396-3302, if you have any questions regarding the enclosed comments.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment
JW:LS:JC/GM
RVC170609-02
Control Number

ATTACHMENT

Health Risk Assessment (HRA)

1. Based on a review of the HRA, SCAQMD staff found that the HRA utilized the 2015 revised OEHHA guidelines to estimate the health risks to sensitive receptors in the proposed project's vicinity and that the AERMOD dispersion model was used to estimate diesel particulate matter (DPM) concentrations. SCAQMD staff recommends that the Lead Agency revise the HRA based on the following comments.
 - a. Sources 1-11 (Truck Idling, On-site Truck Route, and Off-site Truck Route) parameters are inconsistent throughout the air dispersion modeling. Plume heights range from 6 feet to 20.4 feet, and release heights range from 10 feet to 12 feet. SCAQMD staff recommends revising the HRA with consistent plume heights and release heights throughout the Final EIR and technical appendices.
 - b. Sources 1-9 (On-site and Off-site Truck Routes) have a plume height of 20.4 feet. Plume height should be based on a heavy duty truck height, which typically ranges from 9 to 12 feet. By using a higher plume height during truck travel, the HRA has likely underestimated health risks. SCAQMD staff recommends using a plume height more representative of a heavy duty truck profile or providing additional information justifying the plume height.
 - c. Sources 9-11 (Truck Idling) has a plume height of 6 feet and a release height of 12 feet. Plume height during truck idling should be based on a heavy duty truck height, which typically ranges from 9 to 12 feet. Furthermore, the release should be located within the plume. Therefore, SCAQMD staff recommends using a line volume source with a plume height that is more representative of a heavy duty truck profile.

Siting Warehouses Near Residences

2. Based on the project description, the nearest sensitive receptors are within 300 feet to the north of the proposed project. While SCAQMD staff recognizes that there are many factors Lead Agencies must consider when making local planning and land use decisions, there are concerns about the proximity of a warehouse to the existing residences and the potential long-term air quality impacts to the people living near the warehouse and along the truck routes as a result of increased truck activities. SCAQMD staff recommends that the Lead Agency use the California Air Resources Board's (CARB) Air Quality and Land Use Handbook as a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land-use decision making process. In CARB's Air Quality and Land Use Handbook, CARB recommends a buffer of at least 1,000 feet between land uses that will have 100 or more trucks per day¹².

¹² CARB Air Quality and Land Use Handbook: <http://www.arb.ca.gov/ch/handbook.pdf>. Guidance is for siting new sensitive land uses within 1,000 feet of a distribution center, Page 4. The buffer is a neutral mitigation measure provided to minimize truck activity emission impacts to sensitive receptors. Additionally, in April 2017, ARB published a technical advisory, *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways: Technical Advisory*, to supplement ARB's Air Quality and Land Use Handbook: A Community Health Perspective. This Technical Advisory is intended to provide information on strategies to reduce exposures to traffic emissions near high-volume roadways to assist land use planning and

Enforceability of Existing Mitigation Measures (MMs) AQ-1a and AQ-1b

3. CEQA requires that mitigation measures must be fully enforceable through permit conditions, agreements, or other legally binding instruments (Public Resources Code Section 21081.6 (b) and CEQA Guidelines Section 15126.4 (a)(2)). Based on a review of the Air Quality section and Appendix B, *Air Quality and Greenhouses Gases*, SCAQMD staff found that the Lead Agency is committed to meeting the U.S. EPA Tier 3 off-road emission standards for all off-road diesel powered construction equipment greater than 50 horsepower to (MM AQ-1a), and the 2007 model year for all heavy-heavy duty haul trucks accessing the project site (MM AQ-1b). Based on these commitments, the proposed project's construction emission, particularly from NOx, would be mitigated to less than significant. SCAQMD staff recommends that the Lead Agency provides more details in the Final EIR to ensure that both MM AQ-1a and MM AQ-1b are fully enforceable during construction. In the event that MM AQ-1a and MM AQ-1b are found or proved to be infeasible during construction, this constitutes substantial changes that require a new environmental assessment by the Lead Agency to determine if the proposed project's construction air quality impacts will become a new significant environmental effect triggering the preparation of a supplement to the EIR (CEQA Guidelines Sections 15162 and 15163).

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

4. CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant impacts. In the event that the Lead Agency, after revising the HRA 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 EIR. For more information on potential mitigation measures as guidance to the Lead Agency, please visit SCAQMD's CEQA Air Quality Handbook website¹³.
- 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 requirements¹⁴, 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. Limit the daily number of trucks allowed at each facility to levels analyzed in the Final EIR. 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 higher activity level.

decision-making in order to protect public health and promote equity and environmental justice. Available at: <https://www.arb.ca.gov/ch/landuse.htm>

¹³ South Coast Air Quality Management District. <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.

¹⁴ 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).

- d. Promote clean truck incentive programs (see the discussion above regarding Cleaner Operating Truck Incentive Programs).
- e. Provide electric vehicle (EV) Charging Stations (see the discussion below regarding EV charging stations).
- f. 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 Strategy¹⁵. 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 on-site 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 project include the appropriate infrastructure to facilitate sufficient electric charging for trucks to plug-in in addition to the two electric vehicle-charging stations for automobiles and light-duty trucks at each of the two buildings that the Lead Agency is committed in MM AQ-1h (b)¹⁶.
- g. 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 EIR, the Lead Agency should include 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.

Additional Mitigation Measures for Operational Air Quality Impacts (Other Area Sources)

5. In addition to the mobile source mitigation measures identified above, the Lead Agency should incorporate the following onsite area source mitigation measures below to further reduce the proposed project's significant operational air quality impacts.
 - a. Maximize use of solar energy including solar panels; installing the maximum possible number of solar energy arrays on the building roofs and/or on the Project site to generate solar energy for the facility.
 - b. Maximize the planting of trees in landscaping and parking lots.
 - c. Use light colored paving and roofing materials.
 - d. Utilize only Energy Star heating, cooling, and lighting devices, and appliances.
 - e. Install light colored "cool" roofs and cool pavements.
 - f. Require use of electric or alternatively fueled sweepers with HEPA filters.
 - g. Use of water-based or low VOC cleaning products.

Compliance with SCAQMD Rule 403(e) for Large Operations

6. In the Regulatory Setting section of Section 3.3, *Air Quality*, of the RDEIR, the Lead Agency discussed SCAQMD Rule 403(e)¹⁷. The proposed project is a large operation on the 140.23-

¹⁵Southern California Association of Governments. Adopted April 7, 2016. Accessed at: <http://scagtrpccs.net/Pages/default.aspx>.

¹⁶RDEIR. Section 3.3, *Air Quality*. Page 3.3-39.

¹⁷*Ibid.* Page 3.3-13.

acre portion of a 229-acre site (50-acre sites or more of disturbed surface area; or daily earth-moving operations of 3,850 cubic yards or more on three days in any year) in the Basin. The Lead Agency is required to comply with SCAQMD Rule 403(e) – Additional Requirements for Large Operations¹⁸. The requirements may include, but are not limited to, Large Operation Notification (Form 403 N), appropriate signage, additional dust control measures, and employment of a dust control supervisor that has successfully completed the Dust Control in the South Coast Air Basin training class¹⁹. SCAQMD staff recommends that the Lead Agency include a discussion to demonstrate compliance with SCAQMD Rule 403(e) as a requirement for the proposed project in the Final EIR.

Other Comment

7. Based on a review of Section 2, *Project Description*, Section 3.3, *Air Quality*, and the supporting Appendix B, *Air Quality Analysis and Greenhouse Gases*, SCAQMD staff found that there were inconsistencies in the construction schedule. In Section 2, the Lead Agency stated that construction would start in 2017 with building occupancy planned approximately in late 2017²⁰. However, in Section 3.3 and Appendix B, the Lead Agency stated that construction would take approximately two years and that the proposed project was assumed to commence operation in 2018²¹. Moreover, the CalEEMod calculation sheets showed that the proposed project's construction would occur over a year and half from January 2017 to June 2018. Therefore, SCAQMD staff recommends that the Lead Agency revise the air quality and HRA analyses based on one construction schedule consistent throughout the Final EIR and technical appendices.

¹⁸ SCAQMD Rule 403. Last amended June 3, 2005. Available at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf?sfvrsn=4>.

¹⁹ SCAQMD Compliance and Enforcement Staff Contact Information for Rule 403(e) Large Operations is (909) 396-2608 or by e-mail at dustcontrol@aqmd.gov.

²⁰ RDEIR. Section 2, *Project Description*. Page 2-20.

²¹ *Ibid.* Section 3.3, *Air Quality*. Page 3.3-55. Appendix B. Page 112.