CALIFORNIA
AIR RESOURCES BOARD

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December 13, 2019

Jimmy Wong
Contract Planner
City of Santa Fe Springs
11710 East Telegraph Road
Santa Fe Springs, California 90670

Dear Jimmy Wong:

Thank you for providing California Air Resources Board (CARB) staff with the opportunity to comment on the Greenleaf Business Center Project (Project) Initial Study and Mitigated Negative Declaration (IS/MND), State Clearinghouse No. 2019119061. The Project consists of the construction and operation of a non-cold storage warehouse and distribution business totaling 216,500 square feet, which includes 200,500 square feet of industrial/warehouse space and 16,000 square feet of office space. The project also features a large interior truck trailer parking and storage area providing approximately 459 truck trailer parking spaces and a loading dock for up to 46 loading dock positions. Once in operation, the Project is projected to introduce an additional 697 total vehicle trips daily, including 582 daily passenger vehicle trips and 115 daily truck trips. The Project is located within the City of Santa Fe Springs (City), California, which is the lead agency for California Environmental Quality Act (CEQA) purposes.

Freight facilities, such as warehouse and distribution facilities, can result in high daily volumes of heavy-duty diesel truck traffic and operation of on-site equipment (e.g., forklifts, yard tractors, etc.) that emit toxic diesel emissions, and contribute to regional air pollution and global climate change. CARB staff has reviewed the IS/MND and is concerned about the air pollution impacts that would result should the City approve the Project.

I. The Project Would Increase Exposure to Air Pollution in Disadvantaged Communities

The Project, if approved, will expose nearby disadvantaged communities to elevated air pollution. Residences are located immediately east of the Project with the closest residences located approximately 100 feet from the Project's eastern boundary. In addition to residences, 7 schools (St. Paul High School, Sierra Vista High School, Frontier High School, Richard L. Graves Middle School, Lake Marie Elementary School, Laurel Elementary School, and Evergreen Elementary School) are located within 1 mile of the Project. The community is surrounded by existing toxic diesel particulate matter (diesel PM) emission sources, which include existing warehouses as well as Valla Rail Yard. Due to the Project's proximity to residences and schools already

disproportionately burdened by multiple sources of air pollution, CARB staff is concerned with the potential cumulative health impacts associated with the construction and operation of the Project.

The State of California has placed additional emphasis on protecting local communities from the harmful effects of air pollution through the passage of Assembly Bill 617 (AB 617) (Garcia, Chapter 136, Statutes of 2017). AB 617 is a significant piece of air quality legislation that highlights the need for further emission reductions in communities with high exposure burdens, like those in which the Project is located. Diesel PM emissions generated during the construction and operation of the Project would negatively impact the community, which is already disproportionally impacted by air pollution from existing freight facilities and Valla Rail Yard.

Through its authority under Health and Safety Code section 39711, the California Environmental Protection Agency (CalEPA) is charged with the duty to identify disadvantaged communities. CalEPA bases its identification of these communities on geographic, socioeconomic, public health, and environmental hazard criteria (Health and Safety Code, section 39711, subsection (a)). In this capacity, CalEPA currently defines a disadvantaged community, from an environmental hazard and socioeconomic standpoint, as a community that scores within the top 25 percent of the census tracts, as analyzed by the California Communities Environmental Health Screening Tool Version 3.0 (CalEnviroScreen). CalEnviroScreen uses a screening methodology to help identify California communities currently disproportionately burdened by multiple sources of pollution. The census tract containing the Project is within the top 1 percent for Pollution Burden[1] and is considered a disadvantaged community. Therefore, CARB staff urges the City to ensure that the Project does not adversely impact neighboring disadvantaged communities.

II. Recommend Mitigation Measures

According to Section 1.7.5 (Operational Characteristics) of the IS/MND, there will be no refrigerated uses associated with the operation of the proposed warehouse facility upon completion of the Project. Although the Project, as proposed in the IS/MND, will not include refrigerating spaces, CARB staff urges the City to include a Project design measure requiring contractual language in tenant lease agreements that prohibits tenants from operating TRUs within the Project site. This is critical because the operation of refrigerated warehouse facilities would include trucks with transport refrigeration units (TRU) that emit significantly higher levels of toxic diesel PM, nitrogen oxides (NO_x), and greenhouse gases, than trucks without TRUs. Alternatively, the City can include a condition requiring a restrictive covenant over the parcel that prohibits the applicant's use of TRUs on the property unless the applicant seeks and receives an amendment to its conditional use permit allowing such use. If the City does allow TRUs

[1] Pollution Burden represents the potential exposures to pollutants and the adverse environmental conditions caused by pollution.

within the Project site under a restrictive covenant, CARB staff recommends the City require all loading/unloading docks and trailer spaces be equipped with electrical hookups for trucks with TRU or auxiliary power units and reevaluate the Project's health impacts in a recirculated health risk assessment.

CARB staff also urges the City to implement the measures listed below to further reduce the Project's construction and operation air pollutant emissions.

1. Include contractual language in tenant lease agreements that requires tenants to use the cleanest technologies available, and to provide the necessary infrastructure to support the zero-emission vehicles and equipment that will be operating on site.

2. Include contractual language in tenant lease agreements that requires future tenants to exclusively use zero-emission light and medium-duty delivery trucks and vans.

3. Include contractual language in tenant lease agreements that requires all service equipment (e.g., yard hostlers, yard equipment, forklifts, and pallet jacks) used within the project site to be zero-emission. This equipment is widely available.

4. Include contractual language in tenant lease agreements that requires all heavy-duty trucks entering or on the project site to be model year 2014 or later, expedite a transition to zero-emission vehicles, and be fully zero-emission beginning in 2030.

5. Include contractual language in tenant lease agreements that requires the tenant be in, and monitor compliance with, all current air quality regulations for on-road trucks including CARB's Heavy-Duty (Tractor-Trailer) Greenhouse Gas Regulation,[2] Periodic Smoke Inspection Program (PSIP),[3] and the Statewide Truck and Bus Regulation.[4]

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[2] In December 2008, CARB adopted a regulation to reduce greenhouse gas emissions by improving the fuel efficiency of heavy-duty tractors that pull 53-foot or longer box-type trailers. The regulation applies primarily to owners of 53-foot or longer box-type trailers, including both dry-van and refrigerated-van trailers, and owners of the heavy-duty tractors that pull them on California highways. CARB's Heavy-Duty (Tractor-Trailer) Greenhouse Gas Regulation is available at: https://www.arb.ca.gov/cc/hdghg/hdghg.htm.

[3] The PSIP program requires that diesel and bus fleet owners conduct annual smoke opacity inspections of their vehicles and repair those with excessive smoke emissions to ensure compliance. CARB's PSIP program is available at: https://www.arb.ca.gov/enf/hdvip/hdvip.htm.

[4] The regulation requires newer heavier trucks and buses must meet particulate matter filter requirements beginning January 1, 2012. Lighter and older heavier trucks replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent. CARB's Statewide Truck and Bus Regulation is available at: https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm.

6. Include contractual language in tenant lease agreements restricting trucks and support equipment from idling longer than five minutes while on site during project operation.

7. Include rooftop solar panels for each proposed warehouse to the extent feasible, with a capacity that matches the maximum allowed for distributed solar connections to the grid.

III. Conclusion

CARB staff encourages the applicant and City to implement the measures listed above in order to reduce the Project's construction and operational air pollution emissions. CARB staff appreciates the opportunity to comment on the IS/MND for the Project and can provide assistance on zero-emission technologies and emission reduction strategies, as needed.

If you have questions, please contact Michaela Nucal, Air Pollution Specialist, at (916) 324-0226 or via email at michaela.nucal@arb.ca.gov.

Sincerely,

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