Air Quality,
Greenhouse Gases,
Noise Analysis

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To: Mike Nieto, WRA Inc.
From: Noah Tanski, NTEC
Date: October 2, 2022

RE: **15827 Roxford Street MND (Case Number: ENV-2021-8928-MND) – Response to Comment Letter from South Coast Air Quality Management District**

Dear Mr. Nieto:

Noah Tanski Environmental Consulting ("NTEC") has reviewed the comment letter submitted to the City of Los Angeles by South Coast Air Quality Management District ("South Coast AQMD") Staff regarding the Mitigated Negative Declaration ("MND") prepared for the 15827 Roxford Street Project ("Project"). Responses to individual comments in the South Coast AQMD's comment letter have been prepared by Noah Tanski and are included in this response document. I, Noah Tanski, am the Principal of NTEC and was the preparer of the Project's Air Quality Study, which is included as Appendix A to the MND. Based on my technical review, the South Coast AQMD's comment letter does not raise any new CEQA issues and does not require any change to any conclusion identified in the MND.

Please do not hesitate to contact me if you have any questions or require additional information.

Sincerely,

Noah Tanski, Principal

Comment 1

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The City of Los Angeles is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. The following comments include recommended revisions to the CEQA regional air quality impacts analysis for cleanup activities during construction, CEQA localized air quality impacts analysis for construction and operation, mobile source health risk assessment (HRA), and information about South Coast AQMD rules and permits that the Lead Agency should incorporate in the Final MND.

Response to Comment 1

This comment by South Coast AQMD Staff introduces the commentator and provides an overview of their comments and "recommended revisions" to the MND. Regarding their comments and recommendations, the commentator is referred to **Responses to Comments 2 through 8**.

Comment 2

<u>South Coast AQMD Staff's Summary of Project Information in the MND</u>

Based on the MND, the Lead Agency proposes demolishing an existing 182,230 square feet warehouse and constructing two new warehouses with a total of approximately 595,147 square feet, including 15,742 square feet of ancillary office space, on approximately 28 acres[1]. The Proposed Project is located at 15827 Roxford Street in Sylmar[2]. The Proposed Project site is north of Roxford Street, west of Telfair Avenue, and east of the I-5 freeway[3]. The two warehouses with 95 loading docks[4] will involve 278 truck trips per day[5]. Additionally, a small extension of the Proposed Project would extend along an existing driveway to Roxford Street, used as a small surface parking lot for standard vehicles, located 140 feet from residential uses[6]. Based on a review of aerial photographs, South Coast AQMD staff found that the nearest sensitive receptor (e.g., residence) is approximately 956 feet southeast of the Proposed Project, located at the intersection between Roxford Street and Telfair Avenue. Construction of the Proposed Project is anticipated to last approximately 22 months. Operation is expected to start in 2024 as a Project's estimated buildout year.

<u>Comment References</u>

1 MND. Page 13, 15.
2 *Ibid*. Page 7.
3 *Ibid*. Page 8.
4 *Ibid*.
5 Appendix K. Page 33.
6 MND. Page 24.

Response to Comment 2

This comment summarizes the commentator's understanding of Project details, based on information contained in the MND and the transportation assessment report (dated April 21, 2022) in Appendix K. However, many Project details regarding land usage and trip generation were updated in consultation

with the City of Los Angeles Department of Transportation ("LADOT"). These updated Project details can be found in the LADOT Letter contained in Appendix L to the MND. Updated Project details are also contained in a new transportation assessment report prepared by Ganddini Group, Inc. (dated July 19, 2022), also in consultation with LADOT. The updated transportation assessment report is included as Attachment A to this response letter.

Table 1 provides an overview of Project information that is acknowledged by the commentator, based on information contained in the MND and Appendix K. The table compares this information with updated Project information that was developed in consultation with LADOT and contained in Appendix L to the MND, as well as information contained in the new transportation assessment report (Attachment A).

It is important to mention that the updated project information developed in consultation with LADOT and contained in Appendix L to the MND (and shown in **Table 1**) indicates that a total 623,829 square feet of warehousing, office, and manufacturing uses are proposed, which is 28,682 square feet greater than the 595,147 square feet of warehousing and office uses proposed in the MND and Appendix K. This is an error: the updated project containing warehousing, office, and manufacturing uses would also be 595,147 square feet – no larger than the sum of warehousing and office uses proposed in the MND and Appendix K. The ratio of warehousing, office, and manufacturing uses would be proportional to the breakdown of square footages shown in **Table 1**, up to a maximum 595,147 total square feet. Therefore, the updated Project does not involve enlarging the proposed working square footage (i.e., warehousing, office space, and manufacturing square footage) beyond what was disclosed in the MND and Appendix K. The updated Project would also include the addition of a 17,080 square foot mezzanine area, but this area would not constitute warehousing, office, or manufacturing space. It would not be associated with additional warehousing, office, or manufacturing activities, nor would it be associated with any additional workers or vehicle trips.

The updated Project information shown in **Table 1**, but with corrections to the square footage of the proposed land uses (as discussed above), will be incorporated into the Final MND, along with any new or revised analyses that have prepared in accordance with the updated Project information.

Table 1

Information	MND Project Information	Updated Project Information
Warehousing Square Footage	579,405 sqft[A,B]	474,039 sqft[C]
Office Space Square Footage	15,742 sqft[D]	55,516 sqft[E]
Manufacturing Square Footage	0 sqft[F]	94,274 sqft[G]
Total Square Footage	595,147 sqft[H]	623,829[I]
Project Site Acreage	27.93 ac[J]	27.93 ac[K]
Number of Loading Docks	95[L]	95[M]
Truck Trips Per Day (gross)	278[N]	220[O,P]

Notes

A. Equivalent to 595,147 square-foot total warehouse building square footage minus 15,742 square feet of ancillary office space (MND, page 8).

B. The Transportation Assessment contained in Appendix K to the MND assumed that the Project would include 568,313 square feet of "High-Cube Fulfillment Center Warehouse" uses (Appendix K, page 34). The

Air Quality Study contained in Appendix A to the MND assumed that the Project would include 580,663 square feet of "Unrefrigerated Warehouse-No Rail" land use when estimating the Project's emissions with CalEEMod. However, the LADOT Letter contained in Appendix L to the MND acknowledged that the Project would include 474,039 square feet of warehousing uses, consistent with the updated Project information (Appendix L, page 1).

C. Ganddini Group, Inc., "Roxford Street Warehouses Project Transportation Assessment." July 19, 2022. Page 35 (Attachment A). Also see page 1 of Appendix L to the MND.

D. The Transportation Assessment contained in Appendix K to the MND assumed that the Project would include 55,516 square feet of ancillary office space (Appendix K, page 34). The Air Quality Study contained in Appendix A to the MND assumed that the Project would include 32,822 square feet of ancillary office space when estimating the Project's emissions with CalEEMod. However, the LADOT Letter contained in Appendix L to the MND acknowledged that the Project would include 55,516 square feet of ancillary office space, consistent with the updated Project information (Appendix L, page 1).

E. Ganddini Group, Inc., "Roxford Street Warehouses Project Transportation Assessment." July 19, 2022. Page 35 (Attachment A). Also see page 1 of Appendix L to the MND.

F. Neither the MND nor the Transportation Assessment contained in Appendix K to the MND nor the Air Quality Study contained in Appendix A to the MND assumed that the Project would include space specifically dedicated to manufacturing uses. However, the LADOT Letter contained in Appendix L to the MND acknowledged that the Project would include 94,274 square feet of manufacturing uses, consistent with the updated Project information (Appendix L, page 1).

G. Ganddini Group, Inc., "Roxford Street Warehouses Project Transportation Assessment." July 19, 2022. Page 35 (Attachment A). Also see page 1 of Appendix L to the MND.

H. MND, page 8. The Transportation Assessment contained in Appendix K to the MND assumed that the Project would include 623,829 total square feet of "High-Cube Fulfillment Center Warehouse" and ancillary office uses (Appendix K, page 34). The Air Quality Study contained in Appendix A to the MND assumed that the Project would include 613,485 total square feet of "Unrefrigerated Warehouse-No Rail" and ancillary office uses. The LADOT Letter contained in Appendix L to the MND acknowledged that the Project would include 623,829 total square feet of warehousing, manufacturing, and ancillary office uses, consistent with the updated Project information (Appendix L, page 1).

I. Ganddini Group, Inc., "Roxford Street Warehouses Project Transportation Assessment." July 19, 2022. Page 35 (Attachment A). Also see page 1 of Appendix L to the MND.

J. MND, page 8. The Transportation Assessment contained in Appendix K to the MND and the Air Quality Study contained in Appendix A to the MND also utilized a 27.93 Project site acreage.

K. Ganddini Group, Inc., "Roxford Street Warehouses Project Transportation Assessment." July 19, 2022. Page Apx-32 (Attachment A).

L. MND, page 8. The Transportation Assessment contained in Appendix K to the MND also acknowledged that the Project would include 95 loading docks.

M. Ganddini Group, Inc., "Roxford Street Warehouses Project Transportation Assessment." July 19, 2022. Page Apx-32 (Attachment A).

N. Appendix K, page 33. This daily trip generation is not based on the updated Project information and trip generation acknowledged in the LADOT Letter contained in Appendix L to the MND.

O. Ganddini Group, Inc., "Roxford Street Warehouses Project Transportation Assessment." July 19, 2022. Page 33 (Attachment A).

P. This daily trip generation is based on the updated Project information and trip generation acknowledged in the LADOT Letter contained in Appendix L to the MND.

The commentator also notes South Coast AQMD staff's finding "that the nearest sensitive receptor (e.g., residence) is approximately 956 feet southeast of the Proposed Project, located at the intersection between Roxford Street and Telfair Avenue." However, this is inaccurate. The nearest sensitive receptors to the Project would be residential land uses along Roxford Street, which are located approximately 140 feet from where the Project would improve an existing driveway and construct a small surface parking lot for standard vehicles.[i] The sensitive receptor that the commentator references (i.e., the residential use "located at the intersection between Roxford Street and Telfair Avenue") would be located approximately 815 feet from the nearest Project boundary, which is closer than the 956-foot distance measured by South Coast AQMD staff. The MND describes this when stating that "the main portion of the Project site is located…over 800 feet west of residential uses along Telfair Avenue…."[ii]

Response Footnotes

[i] MND, page 24.
[ii] MND, page 24.

Comment 3

South Coast AQMD Staff's Comments

CEQA Regional Air Quality Impacts Analysis for Cleanup Activities during Construction

Based on the Hazards and Hazardous Materials Section in the MND, there is a potential for contaminated soil and/or water that might involve off-site transportation and disposal during site grading activites[7]. Potential hazards on-site were identified: VOC's in soil vapor were detected on-site that exceeded pending supplemental State screening criteria[8]. Two VOCs were also reported in groundwater at concentrations above the screening criteria for drinking water[9]. In addition, an existing warehouse built in 1961 may contain asbestos-containing materials (ACMs) and lead-based paint (LBP)[10] that will require handling, removal, and disposal during demolition activities. It is reasonably foreseeable that cleanup activities for remediating, controlling contaminated soils and/or groundwater, and demolition may occur prior to or concurrently with construction two warehouse buildings. The Lead Agency included the Soil Removal Action Work Plan and Site Assessment to address hazard remediation in Appendix G and H. However, the Lead Agency did not analyze air quality impacts from cleanup activities during construction in the MND.

Cleanup activities will likely involve using heavy-duty, diesel-fueled trucks for soil export, resulting in emissions from truck hauling activities and vehicle trips by workers that will be required to conduct cleanup activities. Additionally, cleanup activities will likely require the use of additional equipment that may differ from typical equipment for grading and site preparation for construction. If cleanup activities are reasonably foreseeable at the time the MND was prepared, the Lead Agency should use good faith

and best efforts to provide information on the scope, types, and duration of cleanup activities, quantify emissions from cleanup activities and include those emissions in the Proposed Project's construction emissions profile to be compared to South Coast AQMD's air quality CEQA significance thresholds for construction to determine the level of significance in the Final MND. Alternatively, if emissions from cleanup activities are not included in the Final MND, the Lead Agency should include a new air quality mitigation measure in the Air Quality Section of the Final MND to commit to evaluating the potential environmental impacts from cleanup activities through CEQA prior to commencing any cleanup activities. If a new air quality mitigation measure is not included in the Final MND, the Lead Agency should provide reasons supported by substantial evidence in the record to explain why a new air quality mitigation measure is not included.

Comment References

[7] *Ibid*. Page 46.
[8] *Ibid*. Page 47.
[9] *Ibid*.
[10] *Ibid*.

Response to Comment 3

As noted by the commentator, "The Lead Agency included the Soil Removal Action Work Plan and Site Assessment to address hazard remediation in Appendix G and H." Appendix G and H contain a "Site Assessment and Human Health Risk Evaluation Report" prepared by Hazard Management Consulting Inc. and a "Soil Removal Action Work Plan" prepared by Hazard Management Consulting Inc., respectively. The former report states that "[t]here were a few locations where soil concentrations exceeded current screening levels," and that "[t]hese areas were limited in volume and extent."[iii] The latter report concludes that "[b]ased on sampling conducted to date, only a limited quantity of VOC contaminated soil is expected to be encountered."[iv] In the "Clarification Letter" contained in Appendix I to the MND (not referenced by the commentator), Hazard Management Consulting Inc. explains that "[t]he concentrations of VOCs detected do not exceed requirements for requiring remedial action…."[v] Based on this information, as well as additional findings contained in these documents, it is not anticipated that the Project would require substantial "cleanup activities" requiring extensive use of construction equipment for soil removal or diesel-fueled trucks for contaminated soil export that could generate more than nominal emissions of criteria or other pollutants. Further, the results of the Project's CalEEMod analysis indicate that construction activities themselves would generate daily emissions that are well-below South Coast AQMD regional thresholds and LSTs,[vi] meaning that it would require inordinate emissions from concurrent soil remediation activities (or even greater emissions from non-concurrent soil remediation activities) to cause exceedances of these thresholds. In fact, even if soil remediation activities were to result in twice the pollutant emissions of the Project's grading phase, they would not be capable of generating exceedances of South Coast AQMD regional thresholds and LSTs. But this would not occur, because soil remediation activities would require no more than a small fraction of the daily on-site construction equipment usage and off-site soil hauling that is assumed to occur as part of the Project's grading phase. And soil remediation activities would take place prior to, not concurrently with, other site development activities.

This reasonable inference that soil remediation would not result in substantial "cleanup activities," much less considerable pollutant emissions, has since been validated by further assessment of the Project site's soils. For example in the "Risk-Based Approval Modification Application" prepared for the Project, Hazard

Management Consulting Inc. determines that "[t]he excavation and removal of PCB impacted soil…prior to grading activities at the Site" would constitute just 50 cubic feet – or approximately 2 cubic yards – of soil.[vii] They also note that "[n]o predominant COPCs were observed for soil," and that other locations with "soil impacts of arsenic, lead, and acetone" were limited to "within the upper 5 feet bgs…."[viii] This document is included as Attachment B to this response letter. As further explained by the "Soil Removal Action Work Plan" contained in Appendix H to the MND, "Out of the 15 detected metals in the soil samples, only arsenic exceeded the human health screening criteria prior to background considerations."[ix] A single "soil sample collected…at 1-foot bgs was the only arsenic detection to exceed" the criteria. The "Soil Removal Action Work Plan" also considers "the presence of elevated acetone in the surface soils" to be "suspect based on the volatility of this compound."[x] Clearly, soil remediation activities associated with the excavation and removal of approximately two cubic yards of PCB-impacted soil would result in nominal emissions that have no potential to cause exceedances of South Coast AQMD regional thresholds and LSTs (for comparison, the Project's less-than-significant grading emissions were estimated assuming the export of 100,000 cubic yards of soils).[xi] Further, the balance of information strongly suggests that other soil remediation activities – if necessary at all – would also be limited and would not require extensive on-site excavation or off-site hauling activities. As such, quantifying emissions from soil remediation activities is not necessary to demonstrate that these activities would result in less than significant impacts to regional and localized air quality, and the considerations identified in this response present enough relevant facts and information to support this conclusion. Moreover, it is questionable how accurate the quantification of emissions associated with the excavation and export of a mere 2 cubic yards of soil could even be.[xii] Because soil remediation activities would result in less than significant impacts to regional and localized air quality, no mitigation measures are required.

Concerning ACMs and LBP: There is no evidence that an existing one-story warehouse structure on the Project site contains ACMs or LBP. The MND acknowledges the State regulatory scheme that would govern the demolition and removal of this structure if ACMs or LBP were discovered, but this is a nevertheless a hypothetical "what-if" scenario. As there is no evidence that the Project site's existing one-story warehouse structure contains ACMs or LBP, it is reasonably presumed that no related "cleanup activities" would be required and that no emissions related to "cleanup activities" of these materials would occur.

Response Footnotes

[iii] Appendix G, page 43.
[iv] Appendix H, page 8.
[v] Appendix I, page 1.
[vi] Appendix A, pages 18-19.
[vii] Hazard Management Consulting Inc., "Risk-Based Approval Modification Application." September 19, 2022. Page 9 (Attachment B).
[viii] Hazard Management Consulting Inc., "Risk-Based Approval Modification Application." September 19, 2022. Page 7 (Attachment B).
[ix] Appendix H, page 4.
[x] Appendix H, page 4.
[xi] Appendix A. See CalEEMod output files for the "Roxford Warehouses Project."
[xii] This amount of excavation could easily be achieved by a single worker without the use of power tools, let alone powered-construction equipment. If a mini-excavator is utilized, it would require no more

than several “scoops.” Additionally, the “hauling” of 2 cubic yards of soil could be achieved by a single gas-powered light-duty pickup truck.

Comment 4

Based on the emission calculations from the California Emissions Estimator Model (CalEEMod) output files, the Lead Agency used a one-way truck trip length of 5 miles to quantify the Proposed Project’s construction emissions from hauling construction materials and importing or exporting soil (demolition and grading). Based on a review of aerial photographs, South Coast AQMD staff found the Sunshine Canyon Landfill as the nearest municipal waste landfill, less than 5 miles from the Project site within Los Angeles County, that could serve the Proposed Project. However, the Lead Agency did not identify a specific landfill for the Proposed Project in the MND. If cleanup activities would include removing and disposal of contaminated soil, ACMs, LBPs, or any hazardous materials, depending on the type of contamination, contaminated materials may not be accepted at Sunshine Canyon Landfill. It may need to be disposed of at a permitted hazardous disposal facility outside Los Angeles County with a one-way truck trip length that is likely longer than 20 miles. Therefore, South Coast AQMD staff recommends that the Lead Agency identify the permitted hazardous disposal facility that the Proposed Project could use to dispose of contaminated soil if the cleanup activities involve transport and off-site disposal of contaminated soil and disclose the information in the Final MND. When quantifying emissions from transportation and off-site disposal, the Proposed Project’s construction emissions from haul truck trips for transporting and disposing contaminated soil based on the appropriate one-way truck trip length should be recalculated. If the default one-way truck trip length of 20 miles is not re-calculated for quantifying emissions from haul truck trips for transporting contaminated soil, the Lead Agency should provide reasons for not re-calculating it supported by substantial evidence in the record.

Response to Comment 4

As explained in **Response to Comment 3**, soil remediation activities associated with the excavation and removal of approximately two cubic yards of PCB-impacted soil would result in nominal emissions that have no potential to cause exceedances of South Coast AQMD regional thresholds and LSTs. Further, the balance of information strongly suggests that other soil remediation activities – if necessary at all – would also be limited and would not require extensive on-site excavation or off-site hauling activities. With regard to ACMs and LBP, there is no evidence that the Project site’s existing one-story warehouse structure contains ACMs or LBP. Therefore, it is reasonably presumed that no related “cleanup activities” would be required and that no emissions related to “cleanup activities” of these materials would occur. Quantifying emissions from soil remediation activities (or ACM and LBP “cleanup activities”) is not necessary to demonstrate that these activities would result in less than significant impacts to regional and localized air quality, and the considerations identified in the **Response to Comment 3** present enough relevant facts and information to support this conclusion. As such, the procedure recommended by the commentator for recalculating “the Proposed Project’s construction emissions from haul truck trips for transporting and disposing contaminated soil” is also not necessary to demonstrate that these activities would result in less than significant impacts to regional and localized air quality.

Comment 5

CEQA Localized Air Quality Impacts Analysis for Construction and Operation

In Appendix A, the Lead Agency analyzes the localized air quality impacts of the Proposed Project during construction and operation and compares them to the South Coast AQMD Localized Significance Thresholds (LST)[11]. However, the Lead Agency uses different receptor distances when determining the South Coast AQMD LST. For construction, the Lead Agency determines that LST used for NO_X and CO is based on a 25-meter receptor distance, while for PM_{10} and $PM_{2.5}$ is approximately 44 meters[12]. For operation, the LST used for NO_X and CO is also based on a 25-meter receptor distance, while approximately 244-meter receptor distance is used for PM_{10} and $PM_{2.5}$[13]. Based on the South Coast AQMD Final Localized Significance Thresholds Methodology, the distance is from the Proposed Project's boundary to the nearest off-site receptor[14]. The receptor distances should be consistent with all criteria pollutants as emissions are generated from the same sources involved in the Project's construction and operation. South Coast AQMD staff recommends that the Lead Agency revise the LST air quality analysis for construction and operation using consistent receptor distances and choose the most conservative distance when re-analyzing this section and include them in the Final MND. If the revision is not included in the Final MND, the Lead Agency should provide reasons for not having it supported by substantial evidence in the record.

Comment References

[11] Appendix A. Page 17-19.

[12] *Ibid*. Page 11.

[13] *Ibid*. Page 12

[14] South Coast AQMD Localized Significance Thresholds can be found at: http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds.

Response to Comment 5

With respect to the matters raised by the commentator, the LST air quality analysis contained in Appendix A to the MND adheres to the guidance issued by the South Coast AQMD in its "Final Localized Significance Threshold Methodology" document ("LST Methodology").[xiii] The LST Methodology explains that "LSTs are developed based upon the size or total area of the emissions source, the ambient air quality in each source receptor area (SRA) in which the emission source is located, and the distance to the sensitive receptor."[xiv] The agency's "Final-Methodology to Calculate Particulate Matter (PM) 2.5 and PM 2.5 Significance Thresholds" document reiterates this explanation in the context of PM_{10}, describing how "[f]or the LST program staff used a dispersion model (ISCST3) to convert the 2.5 μ/m^3 concentration into mass daily PM10 emissions numbers based on the size of the project, location of the project, and distance to the sensitive receptor."[xv] It adds that "[LST] look-up tables were created for projects one to five acres in size and take into consideration location (source receptor area) and distance to the sensitive receptor."[xvi] The LST Methodology states that "for the purposes of a CEQA analysis, the SCAQMD considers a sensitive receptor to be to be [sic] a receptor such as residence [sic], hospital, convalescent facility were [sic] it is possible that an individual could remain for 24 hours."[xvii] However, "[c]ommercial and industrial facilities are not included in the definition of sensitive receptor because employees do not typically remain onsite

for a full 24 hours, but are present for shorter periods of time, such as eight hours."[xviii] Thus, the LST analysis methodology primarily regards impacts to sensitive receptors.

The LST Methodology then explains that "applying a 24-hour standard for PM10 [to sensitive receptors] is appropriate not only because the averaging period for the state standard is 24 hours, but because, according to the SCAQMD's definition, the sensitive receptor would be present at the location for the full 24 hours."[xix] Here, the LST Methodology establishes the correlation between the measurement periods for ambient air quality standards and the length of time that an individual may be present at a location. This correlation determines which LSTs apply to a receptor – sensitive or otherwise. As further explained by the LST Methodology:

> "Since a sensitive receptor is considered to be present onsite for 24 hours, LSTs based on shorter averaging times, such as the one-hour NO_2 or the one-hour and eight-hour CO ambient air quality standards, would also apply. However, LSTs based on shorter averaging periods, such as the NO_2 and CO LSTs, could also be applied to receptors such as industrial or commercial facilities since it is reasonable to assume that a worker at these sites could be present for periods of one to eight hours.[xx]

In other words, LSTs for PM, NO_2, and CO are applicable to sensitive receptors where individuals may be present for 24 hours because they measure whether such individuals could be exposed to pollutant concentrations in excess of the 24-hour PM standards, the one-hour NO_2 standard, or the one-hour and eight-hour CO standards. For non-sensitive receptors such as industrial or commercial facilities where individuals are present for shorter lengths of time, the NO_2 and CO LSTs may be applied because they measure whether such individuals could be exposed to pollutants concentrations in excess of the one-hour NO_2 standard or the one-hour and eight-hour CO standards. In this way, the LST Methodology establishes a distinction concerning which LSTs apply to sensitive and non-sensitive receptors. LSTs were developed based on distances to sensitive receptors, but they may also be applied to non-sensitive receptors in the case of NO_2 and CO, as described above.

As stated earlier, the Project's LST air quality analysis adheres to this guidance:

> "For the purposes of CEQA analysis, the SCAQMD considers a sensitive receptor to be a receptor such as a residence, hospital, or convalescent facility where it is possible that an individual could remain for 24 hours. The SCAQMD does not consider commercial and industrial facilities to be sensitive receptors because employees do not typically remain onsite at such facilities for 24 hours but are present for shorter periods (such as eight hour shifts). However, the SCAQMD suggests that LSTs based on shorter averaging periods, such as the NO_2 and CO LSTs, may also be applied to receptors such as commercial and industrial facilities since it is reasonable to assume that workers at these sites may be present for up to eight hours."[xxi]

The Appendix A Air Quality Study further details how this guidance was applied to the Project's LST analysis, which evaluated impacts to sensitive receptors, but also considered the effects of NO_X and CO on nearby non-sensitive industrial uses. For construction and operations, a 25-meter receptor distance was utilized for NO_X and CO LSTs, because this distance "corresponds with distances to the nearest [non-]sensitive receptors where workers and other users may be present for one to eight hours."[xxii] This is a conservative approach, as the nearest sensitive receptors are located farther than 25 meters from the Project. For construction-related PM emissions, "a receptor distance of 140 feet (approximately 43

meters) was utilized, which corresponds with the distances to the nearest residential sensitive receptor where occupants may be present for 24-hour periods (residential uses along Roxford Street near the Roxford Parking Lot site)."[xxiii] The LST analysis notes that use of this 140-foot distance is conservative because "(1) the vast majority of the Project's on-site construction-related emissions would be emitted at least 800 feet from sensitive receptors – not 140 feet, and (2) Roxford Parking Lot site construction emissions that are emitted 140 feet from sensitive receptors would be substantially less than the emissions that have been considered by this analysis."[xxiv] For operations-related PM emissions, "a receptor distance of 800 feet (approximately 244 meters) was utilized" because "[t]he vast majority of the Project's on-site operational emissions would be emitted from the main portion of the Project site, which is approximately 800 feet from the nearest residential sensitive receptors…."[xxv] However, the Air Quality Study notes that "even if a 140-feet (approximately 43 meters) distance were utilized, the Project's localized operational emissions would not exceed LSTs for this distance, because the Project is estimated to emit less than 1 pound per day of NO_X, CO, PM_{10}, and $PM_{2.5}$ from localized area sources."[xxvi]

Notwithstanding, if a minimum 25-meter receptor distance (which is the shortest distance used for analysis by the LST Methodology) is universally applied for the Project's construction and operations-related LST analyses, emissions still would not exceed any LSTs. Therefore, the entire issue raised by the commentator is moot because revising the LST analysis to utilize "the most conservative" distances (i.e., 25 meters) would not result in any increased impacts or any different findings of significance. As explained in the Appendix A Air Quality Study, "SCAQMD thresholds represent the maximum emissions that would not be expected to cause or materially contribute to an exceedance of NAAQS or CAAQS, which themselves represent the maximum concentrations of pollutants that can be present in outdoor air without any harmful effects on people or the environment."[xxvii] Because the Project's construction and operations-related emissions would not exceed the LSTs for any receptor distance, they would not cause or materially contribute to adverse health impacts or the exceedance of NAAQS or CAAQS in any scenario. **Table 2** compares the Project's localized construction emissions with the applicable South Coast AQMD LSTs at the minimum 25-meter receptor distance. **Table 3** compares the Project's localized operational emissions with the applicable South Coast AQMD LSTs at the minimum 25-meter receptor distance. As shown, no exceedance of LSTs would occur.

Table 2

	Construction Emissions in lbs per day[C]					
	VOC	**NO_X**	**CO**	**SO_x**	**PM_{10}**	**$PM_{2.5}$**
Localized Construction Emissions						
Demolition	0.6	2.6	28.4	0.1	1.7	0.3
Grading	0.9	4.0	40.1	0.1	1.6	0.3
Trenching	0.4	1.6	20.4	<0.1	<0.1	<0.1
Building Construction (Year 1)	0.7	6.4	37.7	0.1	0.1	0.1
Building Construction (Year 2)	0.7	6.4	37.7	0.1	0.1	0.1
Building Construction (Year 2) and Arc. Coatings Overlap	46.4	6.7	41.4	0.1	0.1	0.1
Arc. Coatings and Paving Overlap	47.7	3.8	24.1	<0.1	<0.1	<0.1
Maximum Localized Construction Emissions	47.7	6.7	40.1	0.1	1.7	0.3
Localized Significance Thresholds[A,B]	-	114	786	-	7	4
Exceed Threshold?	**-**	**No**	**No**	**-**	**No**	**No**

Notes

A. LSTs assume a 2-acre maximum daily disturbed acreage, less than the Project's maximum grading activities, which would be approximately 3 acres per day. Use of this project size is consistent with the South Coast AQMD's "Fact Sheet for Applying CalEEMod to Localized Significant Thresholds" document. Utilizing LSTs for a 2-acre project size rather than interpolating LSTs for a 3-acre project site results in more stringent emissions thresholds.

B. As noted earlier, LSTs also assume a minimum 25-meter receptor distance, which is the shortest distance used for analysis in the LST Methodology.

C. Note that some figures may not add up properly due to rounding. The construction emissions shown reflect the implementation of PDF-AQ-1.

Source: NTEC, 2022.

Table 3

	Operations Emissions in lbs per day[C]					
	VOC	**NO_X**	**CO**	**SO_x**	**PM_{10}**	**$PM_{2.5}$**
Localized Operations Emissions	13.2	<0.1	0.1	<0.1	<0.1	<0.1
Localized Significance Thresholds[A, B]	-	172	1,434	-	4	2
Exceed Threshold?	**-**	**No**	**No**	**-**	**No**	**No**

Notes

A. LSTs assume a 5-acre project size, which is the largest project size used for analysis in the LST Methodology.

B. As noted earlier, LSTs also assume a minimum 25-meter receptor distance, which is the shortest distance used for analysis in the LST Methodology.

C. Note that some figures may not add up properly due to rounding.

Source: NTEC, 2022.

Response Footnotes

[xiii] South Coast AQMD, "Final Localized Significance Threshold Methodology." June 2003, Revised July 2008.

[xiv] South Coast AQMD, "Final Localized Significance Threshold Methodology." June 2003, Revised July 2008. Page 1-5.

[xv] South Coast AQMD, "Final-Methodology to Calculate Particulate Matter (PM) 2.5 and PM 2.5 Significance Thresholds." October 2006. Page 4.

[xvi] South Coast AQMD, "Final-Methodology to Calculate Particulate Matter (PM) 2.5 and PM 2.5 Significance Thresholds." October 2006. Page 4.

[xvii] South Coast AQMD, "Final Localized Significance Threshold Methodology." June 2003, Revised July 2008. Page 3-2.

[xviii] South Coast AQMD, "Final Localized Significance Threshold Methodology." June 2003, Revised July 2008. Page 3-2.

[xix] South Coast AQMD, "Final Localized Significance Threshold Methodology." June 2003, Revised July 2008. Page 3-2.

[xx] South Coast AQMD, "Final Localized Significance Threshold Methodology." June 2003, Revised July 2008. Page 3-2.

[xxi] Appendix A, page 9.

[xxii] Appendix A, page 11-12.

[xxiii] Appendix A, page 11-12.

[xxiv] Appendix A, page 12.

[xxv] Appendix A, page 12.

[xxvi] Appendix A, page 12.

[xxvii] Appendix A, page 20.

Comment 6

Mobile Source Health Risk Assessment during Operation

Based on the MND and technical appendices review, South Coast AQMD staff found that the Lead Agency did not perform a mobile source health risk assessment (HRA) during operation. Because the operation of the warehousing portion of the Proposed Project will attract heavy-duty, diesel-fueled vehicular trips (e.g., 278 truck trips per day) that emit diesel particulate matter, which is an air toxic and carcinogen. Additionally, in the California Air Resources Board (CARB) Air Quality and Land Use Handbook: A Community Health Perspective, it is recommended that sitting new sensitive land uses (e.g., residences) should not be sitting within 1,000 ft of a distribution center that accommodates more than 100 trucks per day, more than 40 TRU trucks per day[15] [sic]. The CARB Air Quality and Land Use Handbook provide advisory recommendations on sitting new sensitive land use near source, which are the two warehouses of the Proposed Project [sic]. However, multiple residences are located within 1,000 ft of the Proposed Project site. The nearest sensitive receptor is located within 956 ft southeast of the Proposed Project (refer to the South Coast AQMD Staff's summary above). Furthermore, the Proposed Project would extend along an existing driveway to Roxford Street, which is located 140 ft from residential uses[16], and trucks are also accessed to the Project site via this driveway. Therefore, South Coast AQMD staff recommends that the Lead Agency perform a mobile source HRA with truck routes and compare the Proposed Project's cancer risk to South Coast AQMD CEQA significance threshold of 10 in one million for cancer risk to determine the level of significance for the Proposed Project's health risk impact in the Final MND[17]. If a mobile source HRA is not included in the Final MND, the Lead Agency should provide reasons for not having it supported by substantial evidence in the record.

<u>Comment References</u>

[15] CARB) Air Quality and Lan Use Handbook: A Community Health Perspective can be found at: https://www.arb.ca.gov/ch/handbook/pdf. [sic]

[16] MND. Page 24.

[17] South Coast AQMD's guidance for performing a mobile source health risk assessment can be found at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis.

Response to Comment 6

CARB's recommendation in the Air Quality and Land Use Handbook: A Community Health Perspective ("Air Quality and Land Use Handbook") to "[a]void siting new sensitive land uses within 1,000 feet of a distribution center (that accommodates more than 100 trucks per day…)" does not directly correlate with the South Coast AQMD CEQA significance threshold of 10 in one million for cancer risk.[xxviii] In other words, the fact that the Project would site new warehouses generating more than 100 truck trips per day within 1,000 feet of residential uses does not necessarily demonstrate that the Project would expose nearby residential uses to cancer risks in excess of 10 in one million. Further, it is worth noting that CARB's advisory recommendations regarding warehouses were developed in 2006 and were based on fleetwide diesel particulate matter ("DPM") emissions rates from that time. Since then, numerous regulations and control measures have reduced DPM emissions – and thus corresponding health risks – from trucks. At the time the Air Quality and Land Use Handbook was developed, CARB estimated that a facility accommodating approximately 100 trucks per day could expose sensitive land uses located 1,000 feet from the center of the facility (not the boundary) to cancer risks of nearly 100 in one million. However, CARB estimated that by 2020, cancer risks at this same 1,000-foot distance would be less than 10 in one million. Thus, assuming similar levels of truck activity, warehouse facilities developed after 2020 are associated with a fraction of the health risks that would be associated with warehouse facilities developed at the time the Air Quality and Land Use Handbook was published in 2006. CARB's advisory recommendations regarding warehouses and the siting of sensitive land uses must be understood in this context.

As explained in **Response to Comment 2**, certain Project details regarding land usage and trip generation were updated in consultation with LADOT. Attachment A to this response letter contains an updated transportation assessment report that was prepared by Ganddini Group, Inc., in consultation with LADOT. This updated transportation assessment report estimates that the Project would result in the generation of 220 truck trips per day, or 137 net new truck trips per day based on the fact that the Project site's existing use is estimated to generate 83 truck trips per day (i.e., 220 new truck trips per day minus 83 existing truck trips per day equals 137 net new truck trips per day).[xxix] Because a "significant effect on the environment" is defined as "a substantial, or potentially substantial, adverse change in the environment," the relevant CEQA question is whether development of the Project – as compared to the existing Project site use – would cause nearby residential uses to experience cancer risks in excess of 10 in one million.[xxx] More specifically, the relevant CEQA question is whether the Project's 137 net new truck trips per day would cause exceedances of this threshold at sensitive receptors.

CARB estimates that a warehouse facility accommodating approximately 100 non-TRU trucks (i.e., trucks without transport refrigeration units) per day could expose a sensitive receptor that is approximately 740 feet away (as measured from the center of the facility) to potential cancer risks of 10 in one million.[xxxi] While CARB's advisory recommendation (as discussed earlier) is based on a 1,000-foot measurement from the boundary of a facility, CARB's quantitative estimates of health risks are based on measurements from the center of a facility. As noted, the Project would result in 137 net new truck trips per day, which exceeds the 100 non-TRU trucks per day figure that CARB associates with potential cancer risks of 10 in one million

at a distance of 740 feet from the center of a facility. However, the geometric center (i.e., the "centroid") of the Project would be located approximately 1,000 feet from the nearest sensitive residential receptors located along Roxford Street. It would be located approximately 1,100 feet from sensitive residential receptors located near the intersection of Roxford Street and Telfair Avenue, and nearly 1,600 feet from sensitive residential receptors located along El Dorado Avenue. And due to the shape of the Project site, the nearest sensitive residential receptors located along Roxford Street would actually be located approximately 1,500 feet from the center of the main portion of the Project site containing the proposed warehouse uses. Sensitive residential receptors located near the intersection of Roxford Street and Telfair Avenue would be located approximately 1,425 feet from this point, and sensitive residential receptors located along El Dorado Avenue would be located approximately 1,600 feet from this point.

Further, it is worth noting that CARB's analysis does not consider the effect of regulations beyond 2020, which would further reduce DPM emissions and therefore cancer risks associated with the Project. For example:

- CARB's current Truck and Bus Regulation would require nearly all trucks and buses registered in the State to have 2010 or newer model year engines by January 1, 2023.[xxxii] This date precedes the Project's estimated 2024 operational year, meaning that most (if not all) trucks accommodated by the Project would contain 2010 or newer model year engines. And because CARB's 10 in one million cancer risk at 740 feet estimate is based on 2020 conditions, it does not account for the full implementation of this regulatory program.

- CARB's Advanced Clean Trucks Regulation (ACT), which became effective in March 2021, requires manufacturers to sell zero-emissions trucks as an increasing percentage of their annual California sales from 2024 to 2035. By 2035, zero-emission truck/chassis sales are required to be 55% of Class 2b-3 truck sales, 75% of Class 4-8 straight truck sales, and 40% of truck tractor sales.[xxxiii] The Project's potential cancer risks would be assessed for a 30-year period, meaning that these regulations would be in effect (and would become more stringent) for the entirety of this period, based on the Project's estimated 2024 operational year. Under the ACT, CARB estimates zero-emissions trucks to comprise over 50% of "high priority fleets" (i.e., fleets of more than 50 vehicles owned by the same entity, or fleets owned by entities with more than $50 million annual revenue) by 2050.[xxxiv]

- Executive Order N-79-20, issued by Governor Gavin Newsom in September 2020, sets a goal that 100% of medium- and heavy-duty vehicles in the State be zero-emissions by 2045, meaning that, if achieved, 100% of the Project's medium- and heavy-duty vehicles would be zero-emissions within 30 years of the Project's estimated 2024 operational year. CARB is tasked with achieving this goal and is in the process of exploring various regulatory concepts for its attainment.

Given the balance of considerations presented in this response, the Project's DPM emissions from diesel trucks are not expected to correlate with potential cancer risks exceeding 10 in 1 million at nearby sensitive receptors. This conclusion is a reasonable inference based on relevant facts and information disclosed in the MND, this response, and the references contained within this response. Accordingly, a more detailed mobile source HRA is not necessary or required.

Response Footnotes

[xxviii] CARB, "Air Quality and Land Use Handbook: A Community Health Perspective." April 2005. Page 14-15.

[xxix] Ganddini Group, Inc., "Roxford Street Warehouses Project Transportation Assessment." July 19, 2022. Page 32-33 (Attachment A).

[xxx] CA Public Resources Code Section 21068.

[xxxi] CARB, "Air Quality and Land Use Handbook: A Community Health Perspective." April 2005. Page 13.

[xxxii] CARB, Truck and Bus Regulation Compliance Requirement Overview. June 18, 2019.

[xxxiii] CARB, Advanced Clean Trucks (Factsheet). August 20, 2021.

[xxxiv] CARB, 2022 AQMP Mobile Source Working Group, "Advanced Clean Fleets Regulation" (Presentation, Heavy-Duty Trucks Meeting #2). March 24, 2021.

Comment 7

Responsible Agency and South Coast AQMD Permits

In the event that cleanup activities at the Proposed Project or implementation of the Proposed Project require the use of stationary equipment, permits from South Coast AQMD are required unless a written permit is not required[18]. The Lead Agency should use good faith effort to include a discussion of equipment that will require South Coast AQMD permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project in the Final MND. If any activities involve using equipment that either emits or controls air pollution, the Lead Agency should consult with South Coast AQMD staff to determine whether or not permits or plans are required and approved by South Coast AQMD prior to the operation and to identify if any other South Coast AQMD Rules, such as Rule 413.2 – Sulfur Content of Liquid Fuels[19] and Rule 1110.2 – Emissions from Gaseous and Liquid-Fueled Engines[20], will be applicable and discussed in the Final MND. Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 or visit South Coast AQMD's web page for more general information on permits: http://www.aqmd.gov/home/permits.

Comment References

[18] South Coast AQMD. Rule 219. Accessed at: http//www.aqmd.gov/docs/default-source/rule-book/reg-ii/Rule-219.pdf.

[19] South Coast AQMD. Rule 431.2 – Sulfur Content of Liquid Fuels. Accessed at: http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-431.2.pdf.

[20] South Coast AQMD. Rule 1110.2 – Emissions from Gaseous- and Liquid-Fueled Engines. Accessed at: http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1110.2.pdf.

Response to Comment 7

As discussed in **Response to Comment 3**, soil remediation activities for the Project would be extremely limited. Also, there is no evidence that an existing one-story warehouse structure on the Project site contains ACMs or LBP. Therefore, it is not expected that "cleanup activities" would involve use of

stationary equipment that require South Coast AQMD permits. Soil remediation activities would result in less than significant impacts to regional and localized air quality.

Regarding operations, the Project in its current design would not include the construction or installation of stationary equipment subject to South Coast AQMD rules, regulations, and permitting requirements. Any stationary equipment of future Project users would be subject to South Coast AQMD rules, regulations, and permitting requirements.

Comment 8

Conclusion

According 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. Please provide South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When the Lead Agency's position is at variance with recommendations raised in the comments, the issues raised in the comments should be addressed in detail, giving reasons why specific comments and suggestions are not accepted. There should be good faith and reasoned analysis in the response. Conclusory statements unsupported by factual information do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision-makers and the public who are interest in the Proposed Project.

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Danica Nguyen, Air Quality Specialist, at dnguyen1@aqmd.gov should you have any questions.

Response to Comment 8

Issues raised by the commentator have been addressed by the responses to comments contained in this document.