

March 25, 2024

Benjamin Matlock
Deputy Director of Community Development
City of Yucaipa
34272 Yucaipa Boulevard
Yucaipa, California 92399
bmatlock@yucaipa.gov

Sent via email

Dear Benjamin Matlock:

Thank you for providing the California Air Resources Board (CARB) with the opportunity to comment on the Freeway Corridor Specific Plan (Project) Subsequent Environmental Impact Report (SEIR), State Clearinghouse No. 2006041096. The Project is proposed within the City of Yucaipa California (City), which is the lead agency for California Environmental Quality Act (CEQA) purposes.

Project Description and Background

The Draft Environmental Impact Report (DEIR) prepared for the Project was released for public review in August 2008 and later approved in December 2008. The DEIR proposed the development of 2,447 residential dwelling units, 3,379,737 square feet of Regional Commercial uses, and 1,206,042 square feet of Business Park uses. The DEIR concluded that the Project would have a significant and unavoidable impact on air quality.

Since the certification of the DEIR, the City updated the Project's description to include the Pacific Oaks Commerce Center and Countyline Road Warehouse projects, which necessitated the preparation of the SEIR. The SEIR proposes the development of 2,472 residential dwelling units, 1,100,761 square feet of Regional Commercial uses, and 3,992,503 square feet of Business Park uses on approximately 1,238 acres of land. The proposed Pacific Oaks Commerce Center Project, included in the Project, proposes the construction of two warehouses totaling 2,054,000 square feet, which includes 513,500 square feet of cold storage uses. The Project would result in increases of 25 residential dwelling units, a reduction of approximately 2,278,976 square feet of Regional Commercial uses, and an increase of approximately 2,786,461 square feet of Business Park uses as compared to the DEIR certified in 2008. Once fully built out, the proposed Project would result in up to 73,423 daily vehicle trips along local roadways,

including 2,165 daily truck trips.¹ CARB staff has reviewed the SEIR and has the following concerns:

The SEIR May Have Used Inappropriate Trip Lengths When Modeling the Project's Air Quality Impacts from Mobile Sources

The City may have underestimated mobile source air pollutant emissions in the SEIR by relying on unrealistic truck trip lengths. The Project's operational air pollutant emissions are presented in Section 5.3 (Air Quality) of the SEIR and modeled in Appendix C (Air Quality, Energy, and GHG Modeling). Based on CARB's review of the Project's air quality analysis, the City assumed trucks would travel a distance of 39.9 miles. The City states in Section 5.3 (Air Quality) of the SEIR that the 39.9-mile trip distance was derived from the California Association of Governments (SCAG) Heavy Duty Truck Regional Travel Demand Model and references South Coast Air Quality Management District's (SCAQMD) Warehouse Indirect Source Rule 2305 Implementation Guidelines.^{2,3} SCAQMD's recommended truck trip lengths were calculated using trip length data provided in the SCAG's 2016 Regional Transportation Plan, which includes many short trips in the Los Angeles Region that do not fully reflect the truck trip distances for the Project. Furthermore, the Project is located approximately 83 miles from the Ports of Long Beach and Los Angeles, more than twice the distance used to model Project's mobile emissions in the SEIR. Since trucks serving the Project may originate from the Ports of Long Beach and Los Angeles or other regions further than 39.9 miles, CARB urges the City to use Project-specific truck trip distances in their air quality impact analysis. Unless the City re-evaluates or provides substantiation for the designated truck trip lengths, the Project should include a mitigation measure or project design feature that restricts trucks from traveling a distance greater than what was analyzed in the SEIR.

The City Used Inappropriate Assumptions When Modeling the Project's Health Risk Impacts

The Health Risk Assessment (HRA) prepared for the Project and presented in Section 5.3 (Air Quality) of the SEIR concluded that residences near the Project site would be exposed to diesel particulate matter (PM) emissions that would result in a cancer risk of 156.5

¹ City of Yucaipa. Freeway Corridor Specific Plan Subsequent Environmental Impact Report. Page 7-9. Table 7.3 Accessible at: https://files.ceqanet.opr.ca.gov/77751-7/attachment/VFYyR3W-ljZli4jTK8FJIDfzNjzk8cCz5j_16pzJMFrcAJirkVyQ7ek0xv4B_s7kJZaDBEqKL2OWfmA20

² City of Yucaipa. Freeway Corridor Specific Plan Subsequent Environmental Impact Report. Page 5.3-33. Accessible at: https://files.ceqanet.opr.ca.gov/77751-7/attachment/VFYyR3W-ljZli4jTK8FJIDfzNjzk8cCz5j_16pzJMFrcAJirkVyQ7ek0xv4B_s7kJZaDBEqKL2OWfmA20

³ South Coast Air Quality Management District. WAIRE Implementation Guidelines. June 2021. Accessible at: <https://www.aqmd.gov/docs/default-source/planning/fbmsm-docs/waire-implementation-guidelines.pdf?sfvrsn=12>

chances per million during its operation. In addition to evaluating health risk impacts during the operation of the Project, the City also modeled health risk impacts from the operation of the Pacific Oaks Commerce Center Project, where the City concluded that the operation of the Pacific Oaks Commerce Center Project would expose residences to diesel PM emission that would result in a cancer risk of 131.4 chances per million during its operation. Since the Project would expose residents to a cancer risk that would exceed the SCAQMD's 10 chances in one million significance threshold, the City concluded that the operation of the Project would result in a potentially significant impact on public health.

To reduce the Project's operational health risk impacts, the City included mitigation measures AQ-7 through AQ-9. These mitigation measures would require the use of electric-powered off-road equipment, electric standby and/or hybrid electric transport refrigeration units (TRU) and require truck/dock bays that serve cold storage facilities to be electrified to facilitate plug-in capable TRUs during Project operation. After implementing these mitigation measures, the City concluded in the SEIR that the Project's mitigated operational cancer risks would be reduced to below the SCAQMD's significance threshold. CARB has reviewed the Project's HRA and is concerned that the Project's cancer risk impacts may have been underestimated for the reasons detailed below.

The City may have underestimated the Project's operational cancer risk impacts by not using conservative TRU idling durations in the Project's HRA. Based on CARB's review of the modeling methodology provided in the HRA of the SEIR, the City assumed TRUs on trucks and trailers would idle within the Project site for 1.5 hours per load.⁴ The City sourced this idling duration to Appendix VII (Risk Characterization Scenarios) of the Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles (Risk Reduction Plan) report prepared by CARB. The Risk Reduction Plan represents CARB's proposal for a comprehensive plan to reduce diesel PM emissions. As part of the modeling supporting the Risk Reduction Plan, it was assumed that TRUs could run for 60 minutes to reach the desired temperature and then cycle 25 percent of the time for two hours (i.e., 15 minutes every hour for two hours), equating to 90 minutes of TRU operation.⁵ Since the release of the Plan in October 2000, CARB has obtained survey data indicating trucks with TRUs can operate for as long as two hours while unloading and two hours while loading frozen goods from trucks and trailers, totaling four hours of onsite operation. To conservatively evaluate the Project's cancer risk impacts to residents near the Project site, the City should revise the HRA assuming each TRU visiting the Project site would idle for four hours per visit.

⁴ City of Yucaipa. Freeway Corridor Specific Plan Subsequent Environmental Impact Report. Page 5.3-34. Accessible at: https://files.ceqanet.opr.ca.gov/77751-7/attachment/VFYyR3W-ljZli4jTK8FJIDfzNjzk8cCz5j_16pzJMFrcAJirkVyQ7ek0xv4B_s7kJZaDBEqKL2OWfmA20

⁵ California Air Resources Board. Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles. October 2000. Appendix VII. Page VII-6. Accessible at: <https://ww2.arb.ca.gov/sites/default/files/classic/diesel/documents/rrpapp7.pdf>

CARB is concerned that the cancer risk impacts presented in the Project's operational HRA did not account for all heavy-duty trucks serving the Project. According to Table 7-3 (Daily Trips and VMT Under the No Project (Approved Project) Alternative of the SEIR, the Project would generate a total of 2,165 daily truck trips.⁶ However, based on CARB's review of the Project's HRA, the Project's operational cancer risk impacts only accounted for 779 daily heavy-duty truck trips under the Pacific Oaks Commerce Center Project and 306 daily heavy-duty truck trips under the full buildout of the Project, which equates to 1,085 daily heavy-duty truck trips.⁷ To evaluate the Project's cancer risk impacts, the City must re-model the operational cancer risk impacts in the Project's HRA using the heavy-duty truck trips consistent with what is presented in the SEIR.

The City did not model the cancer risk impacts resulting from the combined operation and construction of the Project. Although the HRA modeled cancer risk impacts from the combined operation and construction of the Pacific Oaks Commerce Center Project, the City should also model the cancer risk impacts associated with the combined construction and operation of the Project as a whole.

The air quality and health risk impacts may have been underestimated by using unrealistic TRU horsepower (HP) ratings. It was assumed in the Project's air quality analysis and HRA that TRUs on trucks visiting the Project site would have a HP rating of 23 and TRUs on trailers visiting the Project site would have a HP rating of 50.⁸ TRUs with a HP rating of greater than 25 have historically fallen under different emissions requirements as compared to TRUs with a HP rating less than 25. Unless the City restricts the HP rating to those modeled in the Project's air quality analysis and HRA, the City must remodel the Project's air quality and cancer risk impacts using an aggregated HP rating derived from the OFFROAD2001 model.

Although the City modeled cancer risk impacts from TRUs on trucks and trailers idling within the Project site, the City did not account for the cancer risk impacts resulting from TRUs on trucks and trailers traveling along local roadways. TRUs on trucks and trailers can emit as much as five times the diesel exhaust than a diesel power truck. Residences and other sensitive receptors (e.g., daycare facilities, senior care facilities, and schools) located near where these TRUs could be operating would be exposed to diesel emissions that would result in a significant cancer risk impact to the nearby community. To provide decision-makers with a better understanding of the extent of the Project's health risk

⁶ City of Yucaipa. Freeway Corridor Specific Plan Subsequent Environmental Impact Report. Page 7-9. Table 7.3 Accessible at: https://files.ceqanet.opr.ca.gov/77751-7/attachment/VFYyR3W-ljZli4jTK8FJIDfzNjzk8cCz5j_16pzJMFrcAJirkVyQ7ek0xv4B_s7kJZaDBEqKL2OWfmA20

⁷ City of Yucaipa. Freeway Corridor Specific Plan Subsequent Environmental Impact Report. Appendix D. Page D-39 through D-44. Accessible at: https://files.ceqanet.opr.ca.gov/77751-7/attachment/BH4q6C-AQXAK9gVX2jKe9wsfixsZCiAmnn8OC-kQL_Qr0yt4Xx-6iivhBpAyHUssAOxwBwKCq_leA0mv0

⁸ City of Yucaipa. Freeway Corridor Specific Plan Subsequent Environmental Impact Report. Appendix C. Page C-1982. Accessible at: <https://files.ceqanet.opr.ca.gov/77751-7/attachment/AcBJiL0HcVks23PFxtTX2pOjhT4CZPA1qOWGCBiiJI9SbeP3NQ5wAMwMkPD7MhyWVP1aDebQvgsibIz0>

impacts, the City must revise the Project's operational HRA to include potential cancer risk impacts associated with TRUs on trucks and trailers traveling local roadways. Although the Emissions Estimator Model (EMFAC) does not provide mobile emission factors for TRUs, the City can estimate the mobile emission rate from TRUs traveling along local roadways by converting the tons per day emission rate obtained from the OFFROAD2021 model using the assumed speed of the trucks and their distance traveled.

The City Must Provide More Meaningful Mitigation Measures to Reduce the Project's Significant and Unavoidable Impact on Air Quality

The City concluded in Chapter 5.3 (Air Quality) of the SEIR that the operation of the Project would result in a significant impact on air quality. According to Table 5.3-13 (FCSP Maximum Daily Regional Operation Emissions), the operation of the full buildout of the Project would emit volatile organic compounds (VOC) as high as 504 pounds per day, oxides of nitrogen (NO_x) as high as 440 pounds per day, carbon monoxide (CO) as high as 3,874 pounds per day, particulate matter less than 10 microns in size (PM₁₀) as high as 1,055 pounds per day, and particulate matter less than 2.5 microns in size (PM_{2.5}) as high as 277 pounds per day, which were all found to exceed the SCAQMD's significance threshold and would result in a significant impact on air quality. To mitigate the Project's operational air quality impacts, the SEIR included eleven mitigation measures (AQ-1 through AQ-11), which included requiring the implementation of fugitive dust measures provided in SCAQMD's Rule 403, requiring the use of Tier 4 Final or stricter emissions limits on offroad equipment during Project construction, requiring the use of electric-powered off-road onsite equipment, requiring electric standby and/or hybrid electric TRUs, and requiring truck/dock bays that serve cold storage facilities to be electrified to facilitate plug-in capable TRUs during Project operation.

While CARB commends the City for its proposed mitigation measures, more could be done to reduce the Project's significant and unavoidable impact on air quality. To reduce the Project's operational VOC, NO_x, CO, PM₁₀, and PM_{2.5} emissions, CARB urges the City to include a measure that requires all heavy-duty trucks to be zero-emission and to install on-site infrastructure to support those zero-emission trucks. As presented below, CARB has many regulations that promote and eventually require the use of zero-emission trucks at freight facilities, such as the proposed Project. Specifically, the Advanced Clean Fleet Regulation would require all drayage trucks in California to be zero-emission by 2035. To support trucks serving the Project that are already complying with the Advanced Clean Fleets regulation, CARB urges the City to require the infrastructure to support on-site zero-emission trucks at the start of Project operations. A list of commercially-available zero-emission trucks can be obtained from the Hybrid and Zero-emission Truck and Bus

Voucher Incentive Project (HVIP).⁹ The HVIP is a part of California Climate Investments to incentivize the purchase of zero-emission trucks. Based on CARB's review of the zero-emission trucks listed in the HVIP, there are commercially available electric trucks that can meet the cargo transportation needs of individual industrial uses proposed in the City today. CARB has implemented or is developing regulations that will require the use of zero-emission trucks.

The list below details the CARB regulations that will result in the reduction of diesel PM and NOx emissions from trucks within California:

- **Drayage Truck Regulation:** The existing Drayage Truck Regulation requires all drayage trucks to operate with an engine that is a 2007 model year or newer.
- **Truck and Bus Regulation:** The Truck and Bus Regulation requires all trucks, including drayage, to have 2010 or newer model year engines by January 1, 2023.
- **Heavy-Duty Low-NOx Omnibus Rule:** The Heavy-Duty Low-NOx Omnibus Rule requires truck emission standards to be reduced from 0.20 to 0.05 grams per brake horsepower-hour (g/bhp-hr) from 2024 to 2026, and to 0.02 g/bhp-hr in 2027.
- **Advanced Clean Trucks Regulation:** The Advanced Clean Trucks Regulation, approved by CARB on June 25, 2020, requires manufacturers to start the transition from diesel trucks and vans to zero-emission trucks beginning in 2024. The rule is expected to result in about 100,000 zero-emission trucks in California by the end of 2030 and about 300,000 by 2035. The Advanced Clean Trucks regulation is part of CARB's overall approach to accelerate a large-scale transition to zero-emission medium- and heavy-duty vehicles. CARB approved amendments to the Advanced Clean Trucks regulation in March 2021; the amendments help ensure that more zero-emission vehicles are brought to market. CARB directed staff to ensure that fleets, businesses, and public entities that own or direct the operation of medium- and heavy-duty vehicles in California purchase and operate zero-emission vehicles (ZEV) to achieve a smooth transition to ZEV fleets by 2045 everywhere feasible, and specifically to reach:
 - 100% zero-emission drayage trucks, last mile delivery, and government fleets by 2035
 - 100% zero-emission refuse trucks and local buses by 2040
 - 100% zero-emission capable utility fleets by 2040
- **Advanced Clean Fleets Regulation:** The Advanced Clean Fleets Regulation is part of CARB's overall strategy to accelerate a large-scale transition to zero-emission medium- and heavy-duty vehicles. This regulation works in conjunction with the Advanced Clean Trucks regulation. The regulation applies to trucks performing drayage operations at seaports and railyards, fleets owned by State, local, and federal

⁹ Zero-Emission Truck and Bus Voucher Incentive Project. Accessible at: <https://californiahvip.org/>

government agencies, and high priority fleets. High priority fleets are those entities that own, operate, or direct at least one vehicle in California, and that have either \$50 million or more in gross annual revenue, or that own, operate, or have common ownership or control of a total of 50 or more vehicles. The regulation affects medium- and heavy-duty on-road vehicles with a gross vehicle weight rating greater than 8,500 pounds, off-road yard tractors, and light-duty mail and package delivery vehicles. All drayage trucks entering seaports and intermodal railyards would be required to be zero-emission by 2035.

With the implementation of the regulations listed above, specifically the Advanced Clean Trucks Regulation, tenants at the proposed development must begin the transition from diesel trucks and vans to zero-emission trucks. To protect the air quality the residences near the Project site, CARB urges the City to include contractual language in tenant lease agreements requiring future tenants to use zero-emission trucks during their operation in the Final Environmental Impact Report (FEIR).

Conclusion

CARB is concerned about the potential public health impacts should the City approve the Project. To fully assess the Project's impact on neighboring communities, the City must use Project-specific truck trip distances when modeling the Project's air quality impacts. On-site TRU idling durations presented in the HRA must be increased from 1.5 hours to 4 hours to conservatively assess the Project's operational air quality and cancer risk impacts. The City must take into account the operation of off-site trucks with TRUs traveling along the proposed alternative truck routes. The City must model emissions from TRUs operating within and outside of the Project site assuming an aggregated HP rating in the OFFROAD2021 model. Lastly, CARB urges the City to include a mitigation measure or project design measure that requires trucks serving the Project to be zero-emission.

CARB appreciates the opportunity to comment on the SEIR for the Project. Given the breadth and scope of projects subject to CEQA review throughout California that have air quality and greenhouse gas impacts, coupled with CARB's limited staff resources to substantively respond to all issues associated with a project, CARB must prioritize its substantive comments here based on staff time, resources, and its assessment of impacts. CARB's deliberate decision to substantively comment on some issues does not constitute an admission or concession that it substantively agrees with the lead agency's findings and conclusions on any issues on which CARB does not substantively submit comments.

Benjamin Matlock
March 25, 2024
Page 8

CARB staff can provide assistance with zero-emission technologies and emission reduction strategies, as needed. Please include CARB on your list of selected State agencies that will receive the FEIR. If you have questions, please contact Stanley Armstrong, Air Pollution Specialist via email at stanley.armstrong@arb.ca.gov.

Sincerely,



Matthew O'Donnell, Chief, Risk Reduction Branch

cc: State Clearinghouse
state.clearinghouse@opr.ca.gov

Yassi Kavezade, Organizer, Sierra Club
yassi.kavezade@sierraclub.org

Sam Wang, Program Supervisor, CEQA Intergovernmental Review, South Coast Air Quality Management District
swang1@aqmd.gov

Morgan Capilla, NEPA Reviewer, U.S. Environmental Protection Agency, Air Division, Region 9
capilla.morgan@epa.gov

Stanley Armstrong, Air Pollution Specialist, Risk Reduction Branch