

Warehouse Working Group (WWG) Meeting

5/6/24

Meeting Summary

A total of 36 people registered for the meeting, including SDAPCD staff.

Agenda items:

- March Meeting Summary
- IEA Warehouse Analysis/Presentation
- APCD truck trip rate analysis
- Working definition of warehouse
- Update on APCD Planning & Policy Committee April 25, 2024, Meeting

The following is a summary of the comments received during the meeting:

- When will preparation of the CEQA and SIA documents begin?
- Nitrogen oxide (NOx) emissions are a contributor to secondary particulate matter (PM). A reduction in NOx will also contribute to a reduction in overall PM emissions.
- CARB's 2019 CEPAM model uses an older version of EMFAC (2017) and therefore does not account for the most current CARB regulations and programs.
- Was the data used in the IEA Warehouse Analysis normalized to account for different city sizes throughout the county?
- The concern with indirect sources is the local impact to neighboring communities. This impact cannot be shown in the IEA Warehouse Analysis because it uses truck count data at various points along the freeways and not truck volumes within communities.
- Would trucks traveling between the port terminals be counted in the Caltrans data?
- How can we develop a rule to reduce illness in impacted communities?
- The information missing from the IEA Warehouse Analysis is amount of illness in the studied areas, e.g., hospital admissions for asthma and cancer.
- How does information from the IEA Warehouse Analysis get incorporated into the decision making? Or will the District prepare a similar analysis with more information, including data from CARB, to help the Governing Board determine the appropriate approach?
- If there is no correlation between warehouses and polluted communities and truck traffic, then alternative proposals that can benefit underserved communities should be developed.
- APCD should consider the trucking logistics associated with the various type of warehouse/industrial development in San Diego. Most larger warehouse buildings

in San Diego operate as regional distribution centers served by long-haul trucks that work a point-to-point route originating from outside of San Diego County. These long-haul trucks are typically hauling a fully loaded 53' trailer and leave San Diego County once unloaded. Alternatively, some smaller warehouse buildings support local retail network distribution. These smaller buildings are typically served by smaller delivery trucks, but these trucks run multi-point routes delivering throughout San Diego County over the course of 6-8 hours.

- The definition of warehouse for this working group and rule is critical because the CoStar dataset is likely capturing facilities that do not conduct warehousing activities.
- APCD should support the development of a truck reservation system at the Otay Mesa border crossing. Improving the truck queueing at the border could result in a significant improvement in diesel PM pollution.
- APCD should review the 6,700 warehouses identified in the CoStar data to determine which of them meet the working WAREHOUSE definition. The truck trip data analysis should account for the updated warehouse inventory.
- APCD should use all available data sources. If Caltrans has actual, real-time truck counts, and information that is more up to date, that information should be used in conjunction with other data sources. The use of modeling and estimates is one way to determine truck trip rates, however, the extrapolation of such data to suggest that a truck is simply going to and from a warehouse may not be correct. The data may not account for trucks that potentially have multiple destination points. The goal should not only be to make an impact, but to make a meaningful impact, and identifying the significant sources of emissions is the key.
- At the border, some of the larger warehouse operators are customs brokers who have no operational control over the trucks that come in and out of their facilities. They have multiple clients that are serviced by various trucking companies. Customs brokers should be included in the WWG discussions to better understand their operations.
- SANDAG should conduct a study on warehousing and goods movement similar to SCAG's *Industrial Warehousing Study* (<https://scag.ca.gov/freightworks-studies-and-programs>).
- SANDAG is in the process of updating its Commercial Vehicle Model that will be based on a survey of businesses across the region conducted in 2022. The report and appendix for the survey are available on the website (<https://www.sandag.org/data-and-research/applied-research-and-performance-monitoring/surveys>). The updated model will be used for the 2025 Regional Plan.
- The 2016 populations for both the SANDAG Activity-Based Model (ABM) and Caltrans Economic Forecasts match, but by 2025 and 2035, SANDAG overestimated population by a significant margin. San Diego's population is trending downward and projected to decrease over the next few years, but the last ABM projected steady growth.

- SANDAG revisits the data every several years to have the most updated assumptions.
- Are warehouse operators currently tracking truck trips to and from their facilities? If not, has the District conducted a survey of warehouse operators to request such information?
- Staff should note at the next Governing Board meeting that it will take a lot of time and work for warehouse operators to collect truck trip data. This does not mean that operators are unwilling to share available information with the District.
- Other alternatives to a warehouse ISR should be considered that can focus on the entire county rather than strategies intended to benefit specific areas.
- One way that the datasets between the SANDAG ABM and the Caltrans traffic data can be validated is to pick a geographic point, e.g., the 805/905 merge, and see how the traffic counts in the model and as observed compare.
- SANDAG calibrates the models according to observed data, including truck and all vehicle counts from Caltrans. There is probably some variation between when counts are collected and made available vs. when the model is developed.