

## **Warehouse Working Group (WWG) Meeting**

**6/3/24**

### **Meeting Summary**

A total of 37 people registered for the meeting, including SDAPCD staff.

Agenda items:

- May Meeting Summary
- Timeline Recap
- APCD Truck Trip Rate Analysis
- Next Steps

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

- SANDAG staff is recommending no further use of the Series 14, ABM2+ modeling data (2016 base year) that was used in the District's truck trip rate analysis. This is mainly due to the factors that the growth forecast and ABM transportation model were developed with pre-pandemic data.
- Does the truck trip analysis account for truck traffic serving other types of facilities such as retail?
- The estimated truck trip rates are calculated with the floor areas of warehouse buildings. The results may not be accurate if the analysis includes buildings that do not conduct warehousing activities.
- Are there other datasets aside from CoStar that can be used to help identify warehouse buildings?
- The average size warehouse for the 100k sq ft and more category in the table for the International Border Community is listed as 225k sq ft (presentation slide 22). This average seems high because most of the warehouses in Otay Mesa are in the 100k to 200k sq ft range.
- Were the adjustment factors shown on slide 16 discussing data gaps used in calculating the truck trip rates?
- Are the truck trip rates referenced from other sources based on the gross square footage of the building?
- A report should be prepared detailing the methodology and results of the truck trip analysis.
- The estimated truck trip rates should be verified with actual data that can be obtained by conducting a traffic study of a subset of the warehouses and a survey of warehouse operators.

- After SCAQMD adopted their warehouse Rule 2305, how does the number of warehouses that were estimated during the rule development process compare to the actual number of warehouses that are subject to that rule?
- According to IEA's Warehouse Study, there is not a strong relationship between emissions and warehouse locations.
- The definition of a "warehouse" should be developed because it is critical to the general warehouse ISR process.
- Will the District's revised report be available before the Governing Board's discussion on proceeding with an ISR or after? It should come before, even if it impacts the timeline. What's clear from this presentation is that more and better data are needed. This is a potentially very impactful moment for the regulated community and getting it right versus relying on best guesses would seem to be the proper approach.
- The data used in the District's analysis (2016 base year) is more conservative than what would come out in the upcoming SANDAG Series 15, ABM3 data (in support of the 2025 Regional Plan). The ABM3 modeling data is likely based on post-pandemic truck volumes, which will presumably be more than the 2016 base year data because warehousing activities have grown in SD County since 2016.
- Population is critical in an activity-based model, and has potential second, third, and fourth order effects that will impact the results.
- Slides 21 to 24 should include the number of warehouses in each size category.
- What will the estimated truck trip rates be used for? What will this mean for the impacted community?
- An ISR may result in tenants moving their operations out of state or further away.
- Do the truck trip rate tables show the trend that smaller warehouses have more daily truck trips to and from their locations (slides 21 - 24)?
- How will staff assess the emission reductions that may result from a potential ISR in relation to CARB's Advanced Clean Fleets Regulation, which will affect heavy duty on-road vehicles?
- Per the CA Health and Safety Code Section 40727, the District is required to make findings before adopting a potential ISR that includes non-duplication, which means the rule does not impose the same requirements as an existing state or federal regulation.
- It is very difficult for the regulated community to have a few regulations that have overlapping requirements.
- Were the truck trip rates estimated for only non-freeway street segments?
- In the analysis, if there was a big warehouse next to a smaller one on the same block, how were the number of truck trips allocated to each warehouse?
- Has an analysis been done for smaller vehicles with GVWR of less than 8,500 pounds? Due to the number of vehicles, these may have a greater impact on emissions than the medium and heavy-duty vehicles that an ISR aims to regulate. This could be a potential alternative to an ISR.

- Where there are dozens of small warehouses within a small area, all of which attract 5 -15 daily trucks, diesel truck traffic can quickly add up. Residents in Barrio Logan regularly voice their concerns about the heavy-duty truck traffic from warehouses in the neighborhood.
- Staff should be wary of attributing the estimated truck trips solely to warehouses. It is possible, and probability would suggest likely, those trucks could be serving other industry sectors.
- There should be a discussion on comparing the working definition of “warehouse” with the CoStar warehouse inventory to ensure the data is applicable.