

Warehouse Working Group (WWG) Meeting

10/7/24

Meeting Summary

A total of 31 people registered for the meeting, including SDAPCD staff.

Agenda items:

- September Meeting Summary
- Updated Truck Trip Rate Analysis
- Baseline Emissions and Reductions
- EPA's Approval of SCAQMD Rule 2305
- Assembly Bill 98

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

- 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.
- Are the estimated truck trip rates in APCD's analysis what would be expected anyway considering that SANDAG's ABM model was built to generate truck volume from industrial land use?
- A report should be prepared detailing the methodology and results of the District's truck trip rate analysis.
- Why is the updated truck trip rate analysis being presented as an improvement in the correlation between warehouse floor area and truck volume if that correlation was already built into SANDAG's model?
- When will the supplement report be available? Given the density of information, adequate time would be needed for stakeholders to review and prepare a response before a public hearing.
- A release timeframe of 30 days prior to the Governing Board meeting is not enough time for the public to review the supplement report.
- The estimated emission reductions from the Advanced Clean Fleets (ACF) Regulation should also be included in the District's analysis.
- There are an estimated 3,500 commercial vehicles that enter the United States via Mexico at the Otay Mesa Port of Entry each day. Much of the emissions at the port of entry are generated from engines idling while vehicles are waiting in line to cross the border. The emissions could be greatly reduced by implementing an appointment system at the border.

- How does the District's estimate (using EPA's COBRA screening tool) of up to \$4.6 million in public health benefits from a potential warehouse ISR compare to the health benefits from other District rules or SCAQMD Rule 2305?
- What will the costs to industry be to comply with a potential ISR?
- The analysis assumes 100% of subject facilities will comply with an ISR. However, the compliance rate with SCAQMD Rule 2305 is approximately 50% of the number of expected facilities. Staff should include in the analysis the scenario of a similar compliance rate of 50% of subject facilities for an ISR in San Diego, which may potentially further reduce the emission reduction benefits of an ISR.
- What is a yard tractor?
- The supplement report should include a comparison between the emission reduction estimates specified in the ISR Framework (~50 tons/yr NOx) and the estimates from the updated analysis (~22 tons/yr NOx).
- Staff should estimate the health benefits of reducing idling times of 3,500 trucks waiting to cross the Otay Mesa Port of Entry each day.
- Another requirement of Assembly Bill 98 is for a county or city to update the circulation element of its general plan, including identifying and establishing specific travel routes for the transport of goods, materials, or freight for storage, transfer, or redistribution to safely accommodate additional truck traffic and avoid residential areas and concentrations of sensitive receptors. The District should comment on these general plan revisions during the environmental review process. This would align with the District's historic Indirect Source Program which consisted of ongoing outreach and assistance to local governments, land developers, citizen groups, and non-profit organizations to reduce vehicle trips and associated emissions through voluntary land use and street design improvements as specified in the District's Regional Air Quality Strategy.
- Is the SCAQMD required to correct the deficiencies identified by the EPA in Rule 2305 by amending the rule within a certain timeframe?
- The author of AB 98 intends to revise the law during the next legislative cycle to make it more stringent. In consideration of subsequent revisions to state law that may consequently impact a local rule, a warehouse ISR for San Diego may not be the most effective strategy for reducing emissions from warehousing activities.
- If the regulated community proposes an alternative strategy to an ISR, will the District analyze and prepare a response to that proposal?
- The comment letter from the Environmental Health Coalition (EHC) proposes that an ISR should regulate warehouse facilities county-wide with floor area of 100,000 sq/ft or more, and all warehouse and distribution facilities in disadvantaged communities operating within 1,000 feet of a sensitive receptor. Generally, the California Health and Safety Code requires control measures for the same emission sources to be uniform throughout the air basin. The District should evaluate whether EHC's proposal for an ISR also applying to facilities in disadvantaged communities operating within some distance of a sensitive receptor is consistent (or not) with State law.
- How can one obtain a copy of EHC's comment letter?