

MEMORANDUM

To: City of Oceanside
From: David Larocca, Senior Air Resource Specialist.
Subject: Multi-Building and Reduced Truck Bay Alternative – Eddie Jones Project
Date: August 2, 2024

This memorandum summarizes potential air quality and greenhouse gas (GHG) emission impacts associated with implementation of the proposed 497,822 total SF Multi-Building and Reduced Truck Bay Alternative in comparison to the 566,905 SF single building proposed project analyzed in the EIR. This analysis uses the significance thresholds in Appendix G of the California Environmental Quality Act (CEQA) Guidelines (14 CCR 15000 et seq.) and the emissions-based significance thresholds recommended by the San Diego Air Pollution Control District (SDAPCD) and other applicable thresholds of significance.

The following analysis refers to the Air Quality and Greenhouse Gas Emissions Report (Appendix B to the EIR) prepared for the Eddie Jones Industrial Way Project and compares the anticipated air quality and GHG emission impacts from the Multi-Building and Reduced Truck Bay Alternative (4-building alternative), which would reduce the number of loading bays and reduce the building footprint square footage and total building square footage in comparison to the proposed project analyzed as part of the EIR. It is assumed that the current air quality and GHG project design features and mitigation measures would also be applied to the 4-building alternative including:

- PDF-AQ-1:** Require the cargo handling equipment including forklifts (forklifts and pallet jacks) and yard tractors for facility operation to be electric powered operation.
- PDF-AQ-2:** Standard construction practices that would be employed to reduce fugitive dust emissions include watering of the active sites two times per day, depending on weather conditions. Construction of Project components would be subject to SDAPCD Rule 55 – Fugitive Dust Control. Compliance with Rule 55 would limit fugitive dust that may be generated during grading and construction activities.
- PDF-GHG-1:** Photo-voltaic (PV) systems will be installed on each building to meet 50% of forecasted electricity demand, consistent with the City of Oceanside Climate Action Plan
- MM-AQ-1** Require Low-Volatile Organic Compound Coatings During Construction. The project applicant and/or their contractors shall ensure that low-VOC coatings with a daily average VOC content of 45 grams per liter (g/l) or less are used during construction for interior building coatings and follow the requirements of Rule 67.0.1 for exterior and building envelop coatings (50 g/l) and traffic marking coatings (100 g/l)

1 Air Quality Impact Discussion

1.1 Air Quality Plan Consistency

If a project proposes development that is greater than that anticipated in the local plan and the growth projections set by the San Diego Association of Governments (SANDAG), the project might be in conflict with the State Implementation Plan and Regional Air Quality Strategy, and therefore may contribute to a potentially significant cumulative impact on air quality. The proposed project was deemed to be consistent with the current air quality plan, because it is consistent with the current land use and zoning designation, and the anticipated growth associated with the Project does not exceed that projected by SANDAG. The 4-building alternative would not change these findings as it would remain consistent with the current land use and zoning designation.

1.2 Construction Criteria Air Pollutant Emissions

Construction of the currently proposed project analyzed in the EIR would result in the temporary addition of pollutants to the local airshed caused by on-site sources (i.e., off-road construction equipment, soil disturbance, and VOC off-gassing) and off-site sources (i.e., on-road haul trucks, vendor trucks, and worker vehicle trips). After implementation of mitigation measure MM-AQ-1, which requires use of low-VOC architectural coatings for indoor building coatings, the maximum daily construction emissions would not exceed the SDAPCD significance thresholds for VOCs, NO_x, CO, SO_x, PM₁₀, or PM_{2.5} during construction. Therefore, the Project would have a less than significant impact with mitigation.

CalEEMod is used for construction emission calculations and calculates short-term construction emissions from land use development projects associated with demolition, site preparation, grading, building construction, paving, and architectural coating from the following sources:

- Exhaust emissions from off-road construction equipment.
- Exhaust emissions from on-road mobile vehicles (workers, vendors, hauling, and onsite trucks).
- Fugitive dust emissions from grading, bulldozing, truck loading, demolition, and on-road vehicles traveling along paved and unpaved roads.
- Evaporative volatile organic compound (VOC) emissions from architectural coating and paving activities.

Construction of the 4-building alternative would impact the same site area and result in no change in demolition, site preparation, and grading emissions. Overall building construction, architectural coatings, and paving related emissions would decrease with the 4-building alternative compared to the currently proposed project as construction equipment operation would decrease, decreasing exhaust and fugitive emissions, with a decrease building square footage from the 566,905 SF single building proposed project analyzed in the EIR to 497,822 total SF Multi-Building and Reduced Truck Bay Alternative. In addition, overall evaporative VOC emission from architectural coatings and paving would decrease with the decreased building square footage of the Multi-Building and Reduced Truck Bay Alternative. Therefore, the 4-building alternative would result in a reduction of construction

criteria emissions ensuring construction criteria pollutant emission impacts remain less than significant with mitigation as determined in the EIR.

1.3 Operational Criteria Air Pollutant Emissions

Operation of the currently proposed project analyzed in the EIR would generate operational criteria air pollutants from mobile sources (vehicles), area sources (consumer product use, architectural coatings, and landscape maintenance equipment), and energy (natural gas). Maximum operational emissions would not exceed the SDAPCD operational significance thresholds for VOCs, NO_x, CO, SO_x, PM₁₀, or PM_{2.5}.

CalEEMod is used for operational emission calculations and calculates operations emissions for land use development from the following sources:

- Exhaust emissions from on-road mobile vehicles, hearths (e.g., stoves, fireplaces), off-road (e.g., forklifts, cranes) equipment, landscaping (e.g., mowers) equipment, and stationary sources (e.g., emergency generators, fire pumps, and process boilers).
- Fugitive dust emissions associated with on-road mobile vehicle travel along roadways.
- Evaporative VOC emissions from architectural coating activities, consumer products, parking lot degreasers, and fertilizers/pesticides.

The reduction in project square footage of the 4-building alternative would decrease the amount of traffic added to nearby roadways. According to the Local Transportation Analysis and Vehicle Miles Traveled Alternative Memorandum prepared by LOS Engineering (Appendix I-1 to the FEIR), with approximately 70,178 less square feet, the project vehicle trip generation would be reduced by approximately 24%. As a result, the exhaust emissions from the 4-building alternative would be less than the currently proposed project analyzed in the EIR. In addition, the reduced 4-building alternative building square footage would reduce overall evaporative VOC emissions. Therefore, the 4-building alternative would result in a reduction of operational criteria emissions ensuring operational criteria pollutant emission impacts remain less than significant as determined in the EIR.

1.4 Cumulative Impacts

The potential for a project to result in a cumulatively considerable impact, per the SDAPCD guidance and thresholds, is based on the project's potential to exceed the project-specific daily thresholds. Because maximum construction and operational emissions would not exceed the SDAPCD significance thresholds for VOCs, NO_x, CO, SO_x, PM₁₀, or PM_{2.5}, the project would not result in a cumulatively considerable increase in criteria air pollutants. As discussed above the 4-building alternative would result in a decrease in construction and operational criteria pollutant emissions and therefore would further support the findings of the EIR that the project would not result in a cumulatively considerable increase in criteria air pollutants.

1.5 Exposure to Sensitive Receptors

Construction Health Risk Assessment

A health risk assessment (HRA) was conducted and included in the EIR to determine the potential impacts of exposure to diesel particulate matter (DPM), which is a TAC, at existing proximate sensitive receptors in the Project vicinity. The results of the HRA demonstrate that TAC exposure from construction diesel exhaust emissions would not result in cancer risk above the 10 in 1 million threshold, nor a Chronic Hazard Index greater than 1.0. Therefore, impacts to sensitive receptors would be less than significant for the currently proposed project.

For both the proposed project and 4-building alternative, the construction distance remains constant, with the nearest receptors. As discussed in Section 1.2, the overall building construction, architectural coatings, and paving related emissions would decrease with the 4-building alternative compared to the currently proposed project as construction equipment operation would decrease, decreasing exhaust and fugitive emissions, with a decrease building square footage from the 566,905 SF single building proposed project analyzed in the EIR to 497,822 total SF Multi-Building and Reduced Truck Bay Alternative. This decrease in exhaust emissions would decrease the amount of DPM emitted during the construction period. A decrease in DPM would decrease the health risk assessment impacts at nearby receptors compared to what was analyzed for the currently proposed project in the EIR, impacts would be less than significant.

Operational Health Risk Assessment

An HRA was performed and included in the EIR to estimate the Maximum Individual Cancer Risk and Chronic Hazard Index for residential receptors associated with project operations. The results of the HRA demonstrate that the TAC exposure from project operation would result in cancer risk less than the 10 in 1 million threshold and Chronic Hazard Index less than 1. Therefore, operation of the project would not expose sensitive receptors to substantial pollutant concentrations; impacts would be less than significant.

The reduction in project square footage of the 4-building alternative would decrease the amount of traffic added to nearby roadways. According to the Local Transportation Analysis and Vehicle Miles Traveled Alternative Memorandum prepared by LOS Engineering (Appendix I-1 to the FEIR), with approximately 70,178 less square feet, the project vehicle trip generation would be reduced by approximately 24%. As a result, the exhaust emissions from operation of the 4-building alternative would be less than the currently proposed project analyzed in the EIR. This decrease in exhaust emissions would decrease the amount of DPM emitted during operation of the project. A decrease in DPM would decrease the health risk assessment impacts at nearby receptors compared to what was analyzed for the currently proposed project in the EIR, impacts would be less than significant.

CO Hotspot Analysis

In the EIR, the County's CO hotspot screening guidance (County of San Diego 2007) were followed to determine whether the Project would require a site-specific hotspot analysis. LOS Engineering Inc. Traffic and Transportation conducted a local transportation study for the project including LOS analysis of the nine intersections. All intersections were determined to have an LOS of A, B or C rating. Therefore, the proposed project would not generate traffic that would contribute to potential adverse traffic impacts that may result in the formation of CO

hotspots and no hotspot analysis is required. Based on these considerations, the Project would result in a less than significant impact to air quality with regard to potential CO hotspots.

The reduction in project square footage of the 4-building alternative would decrease the amount of traffic added to nearby roadways. According to the Local Transportation Analysis and Vehicle Miles Traveled Alternative Memorandum prepared by LOS Engineering (Appendix I-1 to the FEIR), with approximately 70,178 less square feet, the project vehicle trip generation would be reduced by approximately 24%. As a result, intersection LOS with the operation of the 4-building alternative would be less impacted than the currently proposed project analyzed in the EIR. All intersections were determined in the EIR to have an LOS of A, B or C rating. Therefore, the 4-building alternative would not generate traffic that would contribute to potential adverse traffic impacts that may result in the formation of CO hotspots and no hotspot analysis is required. Based on these considerations, the 4-building alternative would result in a less than significant impact to air quality with regard to potential CO hotspots.

1.6 Other Emissions

As described in the EIR, potential odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment, architectural coatings, and asphalt pavement application, which would disperse rapidly from the Project site and generally occur at magnitudes that would not affect substantial numbers of people. Impacts associated with odors during construction would be less than significant. The Project would be a warehouse development that would not include land uses with sources that have the potential to generate substantial odors, and impacts associated with odors during operation would be less than significant.

As discussed in Section 1.2 of this memorandum, the overall building construction, architectural coatings, and paving related emissions would decrease with the 4-building alternative compared to the currently proposed project as construction equipment operation would decrease, decreasing exhaust and fugitive emissions, with a decrease building square footage from the 566,905 SF single building proposed project analyzed in the EIR to 497,822 total SF Multi-Building and Reduced Truck Bay Alternative. This decrease in emissions would decrease the potential for odors during construction of the project and similarly to the currently proposed project the 4-building alternative would be a warehouse development that would not include land uses with sources that have the potential to generate substantial odors, and impacts associated with odors during operation would be less than significant.

2 GHG Emissions Impact Discussion

As discussed in the EIR for the currently proposed project, construction would result in GHG emissions primarily associated with the use of off-road construction equipment, on-road hauling and vendor (material delivery) trucks, and worker vehicles. The Project would generate operational GHG emissions from area sources (landscape maintenance), energy sources (electricity consumption and natural gas combustion), mobile sources (vehicle trips), water supply and wastewater treatment, and solid waste. Estimated annual Project-generated operational emissions in 2024, plus amortized Project construction emissions would be approximately 7,142 MT CO_{2e} per year.

As discussed in Section 1.2 of this memorandum, construction of the 4-building alternative would impact the same site area and result in no change in demolition, site preparation, and grading emissions. Overall building construction, architectural coatings, and paving related emissions would decrease with the 4-building alternative

compared to the currently proposed project as construction equipment operation would decrease, decreasing exhaust and fugitive emissions, with a decrease building square footage from the 566,905 SF single building proposed project analyzed in the EIR to 497,822 total SF Multi-Building and Reduced Truck Bay Alternative. The decrease in exhaust from the construction of the 4-building alternative compared to the currently proposed project would result in a decrease in GHG emissions from the construction of the 4-building alternative compared to the currently proposed project. The reduction in project square footage of the 4-building alternative would decrease the amount of traffic added to nearby roadways. According to the Local Transportation Analysis and Vehicle Miles Traveled Alternative Memorandum prepared by LOS Engineering (Appendix I-1 to the FEIR), with approximately 70,178 less square feet, the project vehicle trip generation would be reduced by approximately 24%. As a result, the exhaust emissions from the 4-building alternative would be less than the currently proposed project analyzed in the EIR. In addition, the reduced 4-building alternative building square footage would reduce energy consumption, water and waste related GHG emissions that are calculated within CalEEMod based on the project square footage. Therefore, the 4-building alternative would result in a reduction of construction and operational GHG emissions, however, the combined construction and operational emissions would remain above the Brightline CAP Threshold of 900 MT GHG per year.

Since the project operational emissions plus amortized project construction emissions would be greater than the City's Climate Action Plan (CAP) GHG threshold of 900 MT CO₂e per year, the Project's consistency with CAP Consistency Checklist as provided in the EIR continues to ensure that emission targets identified in the City's CAP can be achieved considering the additional emissions. As such, the 4-building alternative would generate less GHG emissions than the currently proposed project and is not expected to generate GHG emissions that may have a significant impact on the environment, and would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs and the impact would be less than significant.

3 Conclusion

In summary, the 4-building alternative reduction in total building square footage would result in a decrease of construction and operational criteria pollutant, DPM, and GHG emissions generated by the project. All current air quality and GHG project design features and mitigation measures would also be applied to the 4-building alternative. The air quality and GHG analysis provided for the currently proposed project in the EIR would represent a conservative analysis of the potential air quality and GHG impacts of the 4-building alternative.