

October 16, 2020

Kao Vang
City of Fresno
Planning and Development Department
2600 Fresno Street
Fresno, CA, 93721

Project: P20-01665 - Plan Amendment and Rezone for Southwest Fresno Specific Plan

District CEQA Reference No: 20200761

Dear Ms. Vang:

The San Joaquin Valley Unified Air Pollution Control District (District) has reviewed the Plan Amendment and Rezone Application for the project referenced above from the City of Fresno (City) proposing the rezone 15 parcels located in the Southwest Fresno Specific Plan (SWFSP) area from Neighborhood Mixed Use (NMU) to Light Industrial (IL) zoning (Project).

The Project consists of rezoning 15 parcels located in the SWFSP Plan Area from NMU to the prior designation of IL. The proposed rezoning is intended to correct the zoning designation to match the actual use allowed in the considered area. The IL zoning district is covering a diverse range of light industrial uses, including limited manufacturing and processing, research and development, fabrication, utility equipment and service yards, wholesaling, warehousing, and distribution activities. Small-scale retail and ancillary office uses are also permitted.

Currently, the Project does not include any physical changes, or new construction to existing facilities already developed within the SWFSP. The Project is located at South Elm Avenue/East Vine Avenue, in Fresno, CA, and lies within one of the thirteen communities in the State selected by the California Air Resources Board (CARB) for investment of additional air quality resources and attention under Assembly Bill (AB) 617 (2017, Garcia) in an effort to reduce air pollution exposure in impacted disadvantaged communities.

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In light of the above, the District offers the following comments pertaining to this project:

1) Assembly Bill 617

Assembly Bill 617 requires CARB and air districts to develop and implement Community Emission Reduction Programs (CERPs) in an effort to reduce air pollution exposure in impacted disadvantaged communities, like those in which the Project is located. The South Central Fresno AB 617 community is one of the three Valley communities selected by CARB for investment of additional air quality resources and attention under AB 617.

The CERP for the South Central Fresno was developed through an extensive community engagement process, which included input from members of a Community Steering Committee. The South Central Fresno CERP was adopted by the District's Governing Board in September 2019 and by CARB in February 2020. The CERP identifies a wide range of measures designed to reduce air pollution and exposure, including a number of strategies to be implemented in partnership between agencies and local organizations. The Community Steering Committee has developed, through a collaborative process, a series of emission reduction strategies with the goal to improve community health by reducing exposure to air pollutants. Such emission reduction strategies include, but are not limited to, enhanced community participation in land use processes, the deployment of zero and near-zero emission Heavy-Duty (HHD) trucks, HHD truck rerouting analyses, reducing HHD truck idling, and incorporating vegetative barriers and urban greening. Additional comments related to these measures are offered below. The District appreciates the City's involvement in this program, and encourages the City to further assess the emission reductions measures and strategies included in the CERP, and address them in the Project as appropriate.

For more information regarding the CERP approved for South Central Fresno, please visit the District website at:

<http://community.valleyair.org/selected-communities/south-central-fresno>.

2) Environmental Review Process for Future Development or Occupational Change

While the rezoning itself is not anticipated to have an impact on air quality, future development or future occupation of the existing development by new businesses may contribute result in air quality impacts due to construction activities, demolition activities, increased traffic, and increased operational emissions due to industrial growth. It is the District's understanding that the environmental impacts from the existing facilities and uses already developed in the Project area were evaluated under the Environmental Impact Report (EIR) that was certified for the overall SWFSP Plan Area in 2017. As is consistent with our understanding of the City's intentions, the

District recommends the City conduct environmental review for any future development project or changes to existing development not conforming to the SWFSP Plan Area EIR. Additionally, the City should include the District on any additional environmental documents prepared as a result of future development within the SWFSP Plan Area during the public review process.

The following recommendations should be considered for future development projects that are determined not to conform with the SWFSP Plan Area EIR, depending on the characteristics of each project:

A. Criteria Pollutant Emissions from Construction

Construction emissions are short-term emissions and should be evaluated separately from operational emissions. Equipment exhaust, as well as fugitive dust emissions should be quantified. For reference, the District's annual criteria thresholds of significance for construction are listed above.

Although the rezone itself will not result in construction-related emissions, future development projects may. For future development projects, the District suggests that the City advise project proponents with construction-related exhaust emissions and activities resulting in less than significant impact on air quality to utilize the cleanest reasonably available off-road construction fleets and practices (i.e. eliminating unnecessary idling).

B. Health Risk Assessment

A Health Risk Screening/Assessment identifies potential Toxic Air Contaminants (TAC's) impact on surrounding sensitive receptors such as hospitals, daycare centers, schools, work-sites, and residences. TAC's are air pollutants identified by the Office of Environmental Health Hazard Assessment/California Air Resources Board (OEHHA/CARB) that pose a present or potential hazard to human health. A common source of TACs can be attributed to diesel exhaust emitted from both mobile and stationary sources. List of TAC's identified by OEHHA/CARB can be found at: <https://ww2.arb.ca.gov/resources/documents/carb-identified-toxic-air-contaminants>.

The District recommends future development projects be evaluated for potential health impacts to surrounding receptors (on-site and off-site) resulting from operational and multi-year construction TAC emissions.

- The District recommends conducting a screening analysis that includes all sources of emissions. A screening analysis is used to identify projects which may have a significant health impact. A prioritization, using CAPCOA's updated methodology, is the recommended screening method.

A prioritization score of 10 or greater is considered to be significant and a refined Health Risk Assessment (HRA) should be performed.

For your convenience, the District's prioritization calculator can be found at: http://www.valleyair.org/busind/pto/emission_factors/Criteria/Toxics/Utilities/PRIORITIZATION%20RMR%202016.XLS

- The District recommends a refined HRA for projects that result in a prioritization score of 10 or greater. Prior to performing an HRA, it is recommended that the Project proponent contact the District to review the proposed modeling protocol. The Project would be considered to have a significant health risk if the HRA demonstrates that the Project related health impacts would exceed the District's significance threshold of 20 in a million for carcinogenic risk and 1.0 for the Acute and Chronic Hazard Indices, and would trigger all feasible mitigation measures. The District recommends that Projects that result in a significant health risk not be approved.

For HRA submittals, please provide the following information electronically to the District for review:

- HRA AERMOD model files
- HARP2 files
- Summary of emissions source locations, emissions rates, and emission factor calculations and methodology.

More information on toxic emission factors, prioritizations and HRAs can be obtained by:

- E-Mailing inquiries to: hramodeler@valleyair.org; or
- The District can be contacted at (559) 230-6000 for assistance; or
- Visiting the District website (Modeling Guidance) at: http://www.valleyair.org/busind/pto/Tox_Resources/AirQualityMonitoring.htm.

C. District Rule 9510 (Indirect Source Review)

The purpose of District Rule 9510 is to reduce the growth in both NO_x and PM₁₀ emissions associated with development and transportation projects from mobile and area sources associated with construction and operation of development projects. The rule encourages clean air design elements to be incorporated into development projects. In case the proposed development project clean air design elements are insufficient to meet the targeted emission reductions, the rule

requires developers to pay a fee used to fund projects to achieve off-site emissions reductions.

Accordingly, future development project(s) within the Project area would be subject to District Rule 9510 if:

- Upon full build-out, the project would receive a project-level discretionary approval from a public agency and would equal or exceed any one of the following applicability thresholds:
 - 50 dwelling units
 - 2,000 square feet of commercial space;
 - 25,000 square feet of light industrial space;
 - 100,000 square feet of heavy industrial space;
 - 20,000 square feet of medical office space;
 - 39,000 square feet of general office space; or
 - 9,000 square feet of educational space; or
 - 10,000 square feet of government space; or
 - 20,000 square feet of recreational space; or
 - 9,000 square feet of space not identified above
- Or would equal or exceed any of the applicability thresholds in Section 2.2 of the rule.

District Rule 9510 also applies to any transportation or transit development projects where construction exhaust emissions equal or exceed two (2.0) tons of NO_x or two (2.0) tons of PM₁₀. In cases where a future development project is subject to District Rule 9510, an Air Impact Assessment (AIA) application must be submitted to the District no later than applying for a final discretionary approval with the public agency. To address air quality impacts associated with future projects and to facilitate project compliance, the District recommends that demonstration of compliance with District Rule 9510 be made a condition of future projects before issuance of their first building permit.

Information about how to comply with District Rule 9510 can be found online at:
<http://www.valleyair.org/ISR/ISRHome.htm>.

The AIA application form can be found online at:
<http://www.valleyair.org/ISR/ISRFormsAndApplications.htm>.

District staff is available to provide assistance with determining if future development projects will be subject to Rule 9510, and can be reached by phone at (559) 230-6000 or by email at ISR@valleyair.org.

D. Voluntary Emission Reduction Agreement

Future development from the proposed Project could have a significant impact on regional air, the District recommends the additional environmental review also include a discussion on the feasibility of implementing a Voluntary Emission Reduction Agreement (VERA) for this Project.

A VERA is a mitigation measure by which the project proponent provides pound-for-pound mitigation of emissions increases through a process that develops, funds, and implements emission reduction projects, with the District serving a role of administrator of the emissions reduction projects and verifier of the successful mitigation effort. To implement a VERA, the project proponent and the District enter into a contractual agreement in which the project proponent agrees to mitigate Project specific emissions by providing funds for the District's incentives programs. The funds are disbursed by the District in the form of grants for projects that achieve emission reductions. Thus, project-specific regional impacts on air quality can be fully mitigated. Types of emission reduction projects that have been funded in the past include electrification of stationary internal combustion engines (such as agricultural irrigation pumps), replacing old heavy-duty trucks with new, cleaner, more efficient heavy-duty trucks, and replacement of old farm tractors.

In implementing a VERA, the District verifies the actual emission reductions that have been achieved as a result of completed grant contracts, monitors the emission reduction projects, and ensures the enforceability of achieved reductions. After the project is mitigated, the District certifies to the Lead Agency that the mitigation is completed, providing the Lead Agency with an enforceable mitigation measure demonstrating that project-specific regional emissions have been mitigated to less than significant. To assist the Lead Agency and project proponent in ensuring that the environmental document is compliant with CEQA, the District recommends the Draft EIR includes an assessment of the feasibility of implementing a VERA.

E. Heavy Duty Truck Replacement with Zero and Near Zero-Emission Technology

The District is currently designated as extreme non-attainment of the federal national ambient air quality standard for ozone and non-attainment for PM_{2.5}. Mobile source emissions resulting from growth and development could have significant impacts on air quality. The San Joaquin Valley will not be able to attain stringent health-based federal air quality standards without significant reductions in emissions from HHD trucks, the single largest source of NO_x emissions in the San Joaquin Valley. The District recently adopted the *2018 PM_{2.5} Plan* for meeting federal PM_{2.5} standards in the San Joaquin Valley, and which relies on significant new emissions reductions from HHD trucks. These reductions include those

achieved through the implementation of the California Air Resources Board (CARB) Statewide Truck and Bus Regulation, which requires truck fleets operating in California to meet the 2010 0.2 g/bhp-hr NO_x standard by 2023. Additionally, to meet the federal air quality standards by the 2020 to 2024 attainment deadlines, the Plan relies on a significant and immediate transition of HHD truck fleets to zero or near-zero emissions technologies, including the near-zero truck standard of 0.02 g/bhp-hr NO_x established by the California Air Resources Board.

The, District recommends the City consider the following emission reduction measures for relevant future development projects:

- Operational fleets to utilize the cleanest available HHD truck technologies, including zero and near-zero (0.02 g/bhp-hr NO_x) technologies as feasible,
- All on-site service equipment (cargo handling, yard hostlers, forklifts, pallet jacks, etc.) from development projects (such as distribution centers, warehouse, etc.) to utilize zero-emissions technologies as feasible, and
- Operational fleets and on-site service equipment to implement best practices (i.e. eliminating unnecessary idling).

In addition, to support the use of a clean HHD truck fleet, the District offers incentives for the replacement of an in-use diesel truck with cleaner technology, including battery-electric, hybrid, and near-zero emission trucks. The goal of this strategy is to reduce emissions from HHD diesel trucks operating in the City. By reducing or eliminating emissions from HHD trucks, significant PM_{2.5}, diesel particulate matter, and NO_x emissions reductions can be achieved.

F. Reduce Idling of Heavy Duty Trucks

The diesel exhaust from excessive idling has the potential to impose significant adverse health and environmental impacts. Therefore, efforts to ensure compliance of the anti-idling regulation, especially near sensitive receptors, is important to limit the amount of idling within the community. If future development occurs within the Project-site, reducing idling from HHD trucks is especially critical as there are residential units and a middle school which are located approximately 0.15 miles east of the Project.

G. Truck Rerouting Patterns

If future development occurs, the District recommends the City work with the project proponent(s) to re-evaluate HHD truck routing patterns and to identify alternative routes to lessen the potential localized health and air quality impacts to sensitive receptors. The nearest sensitive receptors include residential units and

a middle school which are located approximately 0.15 miles east of the Project. Towards that end, the City should work with the project proponent(s) to evaluate potential routing alternatives that take into consideration localized health and air quality impacts to sensitive receptors.

H. Vegetative Barriers and Urban Greening

As mentioned above, the Project does not include any physical changes, or new construction to existing facilities already developed within the SWFSP. However, there are residential units and a middle school which are located approximately 0.15 miles to the east of the Project that may be impacted by future development.

If future development occurs, the District suggests the City consider the feasibility of incorporating vegetative barriers and urban greening as a measure to further reduce air pollution exposure on sensitive receptors.

While various emission control techniques and programs exist to reduce air quality emissions from mobile and stationary sources, vegetative barriers have been shown to be an additional measure to potentially reduce a population's exposure to air pollution through the interception of airborne particles and the uptake of gaseous pollutants. Examples of vegetative barriers include, but not limited to the following: trees, bushes, shrubs, or a mix of these. Generally, a higher and thicker vegetative barrier with full coverage will result in greater reductions in downwind pollutant concentrations. In the same manner, urban greening is also a way to help improve air quality and public health in addition to enhancing the overall beautification of a community with drought resistant low maintenance greenery.

I. Other District Rules and Regulations

Future development projects may also be subject to the following District rules: Regulation VIII, (Fugitive PM₁₀ Prohibitions), Rule 4102 (Nuisance), Rule 4601 (Architectural Coatings), Rule 4641 (Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations), Rule 4702 (Internal Combustion Engines – Phase 1), Rule 4201 (Internal Combustion Engines – Phase 2), and Rule 4101 (Visible Emissions). In the event an existing building will be renovated, partially demolished or removed, the project may be subject to District Rule 4002 (National Emission Standards for Hazardous Air Pollutants).

The above list of rules is neither exhaustive nor exclusive. To identify other District rules or regulations that apply to this Project or to obtain information about District permit requirements, the applicant is strongly encouraged to contact the District's Small Business Assistance (SBA) Office at (559) 230-5888.

A current list of all District rules can be found on the District's website:
www.valleyair.org/rules/1ruleslist.htm.

The District recommends that a copy of the District's comments be provided to the Project proponent. If you have any questions or require further information, please contact Eric McLaughlin by e-mail at Eric.McLaughlin@valleyair.org or by phone at (559) 230-5808.

Sincerely,



AM Arnaud Marjollet
Director of Permit Services

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