South Coast
Air Quality Management District
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Review of the Draft Mitigated Negative Declaration (Draft MND) for Proposed Plot Plan PA08-0072

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the lead agency and should be incorporated into either a Revised Draft or Final Mitigated Negative Declaration (Final MND) as appropriate.

The SCAQMD staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,

Susan Nakamura
Planning and Rules Manager
Planning, Rule Development & Area Sources

Attachment

SN:DG

RVC090310-06
Control Number

Air Quality Analysis and Mitigation Measures:

1. On page 4-6 and 4-7 of section 4.0 of the Air Quality Impact Study for the Draft MND the lead agency assesses the regional significance impacts for the project's operational activities. The lead agency summarizes the project's regional operational emissions in Tables 10; however, as described in Section 3.1.2 of the Air Quality Impact Study the emissions results are based on a commercial trip length of 8.9 miles from the Fontana Truck Generation Study and San Bernardino Association of Governments data. The draft MND provides no information of the applicability of the aforementioned data and the proposed project.

   Based on similar warehouse projects, the trip length is longer and thus a commercial trip length of 8.9 miles could lead to an underestimation of on-road mobile source emissions, at least for some pollutants. Therefore, SCAQMD staff recommends that the lead agency recalculate the mobile source emissions using actual fleet characteristics based on the project's anticipated operations. The mobile source emissions calculation should account for the project's daily trip generation rate (i.e. trips per day), applicable trip lengths (miles per one-way trip), and emission factors for each vehicle category including passenger cars, medium-duty trucks, and heavy-duty trucks. The mobile source emissions calculation should also reflect the actual percentage of the truck fleet creating mobile source emissions within the South Coast Air Basin and to the California border.

2. In the event that the lead agency's revised regional air quality analysis demonstrates that any criteria pollutant emissions exceed the SCAQMD's daily significance thresholds, the SCAQMD staff recommends that the lead agency consider adding the following mitigation measures to further reduce air quality impacts from the construction phase of the project, if feasible:

   NOx:

   - Prohibit vehicle and engine idling in excess of five minutes and ensure that all off-road equipment is compliant with the California Air Resources Board's (CARB) in-use off-road diesel vehicle regulation and SCAQMD Rule 2449,
   - Require all diesel-powered construction equipment to be equipped with a minimum of Tier 3 emission controls
   - Require the use of alternative fueled off-road construction equipment,
   - Require the use of electricity from power poles rather than temporary diesel or gasoline power generators,
   - Develop park and ride programs,
   - Electrify service equipment facility,
   - Electrify auxiliary power units,
   - Provide onsite services to minimize truck traffic in or near residential areas, including, but not limited to, the following services: meal or cafeteria service, automated teller machines, and
   - Restrict operation to "clean" trucks, such as a 2007 or newer model year or 2010 compliant vehicle.

For additional measures to reduce off-road construction equipment emissions, refer to the mitigation measure tables located at the following website: www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html.

3. Also, it is recommended that the lead agency consider the following mitigation measures to further reduce operational and cumulative operational air quality impacts from the proposed business park project:

- Avoid siting new sensitive land uses within 1,000 feet of the warehouse/distribution center,
- Design the warehouse/distribution center such that entrances and exits are such that trucks are not traversing past neighbors or other sensitive receptors,
- Design the warehouse/distribution center such that any check-in point for trucks is well inside the facility property to ensure that there are no trucks queuing outside of the facility,
- Design the warehouse/distribution center to ensure that truck traffic within the facility is located away from the property line(s) closest to its residential or sensitive receptor neighbors,
- Restrict overnight parking in residential areas,
- Establish overnight parking within the warehouse/distribution center where trucks can rest overnight,
- Establish area(s) within the facility for repair needs,
- Develop, adopt and enforce truck routes both in and out of city, and in and out of facilities,
- Have truck routes clearly marked with trailblazer signs, so trucks will not enter residential areas,
- Identify or develop secure locations outside of residential neighborhoods where truckers that live in the community can park their truck, such as a Park & Ride,
- Provide food options, fueling, truck repair and or convenience store on-site to minimize the need for trucks to traverse through residential neighborhoods,
- Re-route truck traffic by adding direct off-ramps for the truck or by restricting truck traffic on certain sensitive routes,
- Improve traffic flow by signal synchronization,
- Use street sweepers that comply with SCAQMD Rules 1186 and 1186.1,
- Require or provide incentives for particulate traps that meet CARB certified level 3 requirements,
- Electrify service equipment at facility, and
- Conduct air quality monitoring at sensitive receptors.

Health Risk Assessment:

4. Page 2 of the Health Risk Assessment (HRA) states that traffic volumes were developed from the daily vehicle movements in the traffic study. However, the values presented in Table 2 of the Traffic Study are much larger than those in the HRA.

Category	Traffic Report (Table 2) Daily Trips	HRA Daily Trips*
Passenger Cars	699	
2-Axle Trucks	46	3
3-Axle Trucks	82	16
4-Axle Trucks	325	54
Total Trucks	452	73

* The daily trips are listed in the HRA Vehicle Distribution spreadsheet as originating from Bldg 1. However in the emissions spreadsheet the same trips are distributed between Bldg 1 and Bldg 2.

The truck vehicle fuel vehicle profile from the Vehicle Distribution spreadsheet in the HRA states that all four-axle trucks are diesel. So, it appears that there should be at least 325 diesel truck trips. The truck trips in the HRA should match the truck trips in the Traffic Report in the Final MND.

5. The idling emissions were estimated based on five minutes of idling. State law generally restricts diesel truck idling to five minutes per event. However, there is no restriction to the number of idling events per trip. Since trucks may idle entering or exiting the facility, before approaching or after leaving loading docks and because of any congestion on-site, SCAQMD staff recommends that the lead agency use 15 minutes of idling per trip. If less than 15 minutes of idling is used, SCAQMD recommends that a mitigation measure be added that limits idling to 15 minutes on-site per truck trip.

6. The six sensitive receptors are listed in the text of the HRA; however, no UTM coordinates were provided for these receptors. Without the coordinates of the sensitive receptors is not possible to verify that the correct concentrations were obtained from the ISCST3 output. The UTM coordinates of the sensitive receptor or some other means of identifying the spatial locations with the concentrations estimated by ISCST3 needs to be presented in the Final MND.

7. Health risk estimated for children at near by schools was estimated using an exposure rate of five hours per day, 200 days per year for nine-years. SCAQMD only recognizes residential/sensitive receptors and worker receptors. Children at schools are considered sensitive receptors. Therefore, health risk for children at schools should be estimated using a exposure period of 24-hour per day, 350 day per year over 70 years. Health risks should be estimated using SCAQMD methodology in the Final MND.

8. SCAQMD meteorology files were used for the air dispersion modeling. When SCAQMD meteorology files are used the calms routine must be bypassed in the air dispersion options. Health risk presented in the Final HRA should be based on air dispersion modeling with the calms routine must be bypassed in the air dispersion options.

9. Electronic HRA files (ISCST input and output, associated spreadsheets used to develop emission rates or source parameters) were not provided in with the HRA for public comment. Without the electronic files SCAQMD staff cannot verify spatial allocations are correct. Electronic HRA files should be provided with the Final MND and response to comments.