



South Coast  
Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182  
(909) 396-2000 • www.aqmd.gov

E-mailed: June 2, 2010  
ggibson@rialtoqa.gov

June 2, 2010

Ms. Gina Gibson  
Senior Planner  
City of Rialto  
Department of Development Services, Planning Division  
150 South Palm Avenue  
Rialto, CA 92376

**Review of the Draft Environmental Impact Report (Draft EIR)  
for the Oakmont Olive Grove Project**

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are intended to provide guidance to the lead agency and should be incorporated into the revised Draft or Final Environmental Impact Report (Draft or Final EIR) as appropriate.

AQMD staff is concerned that diesel truck traffic associated with the project presents significant air quality impacts to adjacent sensitive land uses such as residences and a park. Further, the calculated air quality impacts and health risks may be underestimated in the Draft EIR due to incorrect input parameters in the air quality analysis. The air quality analysis could be improved by: considering localized impacts from NO<sub>x</sub> during project operations, correcting underreported emission factors for truck refrigeration units (TRUs), and increasing the commercial truck trip lengths (12.6 miles). AQMD staff strongly recommends that the lead agency incorporate additional mitigation measures given the significant air quality impacts already determined for this project and the potential for additional air quality impacts upon revision of this analysis.

Pursuant to Public Resources Code Section 21092.5, please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. Further, 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,

A handwritten signature in black ink that reads "Ian V. MacMillan". The signature is written in a cursive, slightly slanted style.

Ian MacMillan  
Program Supervisor, CEQA Inter-Governmental Review  
Planning, Rule Development & Area Sources

Attachment

IM:DG

SBC100413-01  
Control Number

## **OPERATIONAL AIR QUALITY IMPACTS**

### Localized Operational NOx Impacts

1. The lead agency concluded that no significant long term air quality impacts would occur from the project because the project's localized PM10 emissions do not exceed the applicable localized significance threshold (LST). However, PM10 impacts are not necessarily indicative of localized NOx emission impacts because truck fleets may have disproportionate PM10 and NOx control efficiencies. Therefore, AQMD staff requests that the lead agency calculate the project's localized operational NOx air quality impacts and compare the results to the applicable Ambient Air Quality Standards. Guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/ceqa/handbook/LST/LST.htm>. Further, AQMD staff requests that the lead agency review and revise as necessary Table F (Local Air Quality Monitoring Summary) and Table H (AQMD Local Air Quality Threshold of Significance) of the Air Quality Appendix to reflect the correct background data for and significance thresholds for the proposed project.

### Trip Length for Regional Operational Emissions Calculations

2. On page 5.10-31 of the Draft EIR the lead agency assesses the regional air quality impacts from the project's operational activities. The Draft EIR and URBEMIS2007 output sheets provided in Appendix C of the Air Quality Impact Analysis indicate that the lead agency used a trip length of 12.6 miles for customer trips to the proposed project. However, the standard trip length that has been applied to similar industrial projects reviewed by the AQMD is 40 miles per one-way trip. For the type of industrial facilities proposed in the project most vehicle trips are typically made by heavy-duty trucks hauling consumer goods, often from the Ports of Long Beach and Los Angeles (POLA and POLB) and/or to destinations outside of California. Thus, a commercial trip length of 12.6 miles would not be representative of haul truck activities at these types of facilities and, therefore could lead to an underestimation of on-road mobile source emissions.

AQMD staff recommends that the lead agency recalculate the mobile source emissions using actual fleet characteristics based on a reasonable worst case of the project's anticipated commercial operations. The mobile source criteria pollutant and GHG emissions calculations should account for the project's applicable trip lengths (miles per one-way trip) within the South Coast Air Basin and up to the California border, respectively. Once the lead agency has recalculated the mobile source emissions to reflect a more appropriate trip length AQMD staff requests that the lead agency revise the Final EIR, quantifying peak daily air quality impacts and summarizing all emissions from the planned operational activities including NOx, SOx, CO, PM10, PM 2.5, VOC and CO<sub>2</sub>e.

## **HEALTH RISK ASSESSMENT**

### Health Risk Assessment Emission Factors

3. The emission factor calculations used for the TRUs are not correct. Page 9 of the HRA states that 0.30 grams per hour is the highest allowable emission limit for TRUs set in Section 2477 of Division 3, Chapter 9, Title 13, CRC. The legislation sets two emission factor limits: 0.30 grams per brake horsepower hour for TRUs that are rated less than 25 brake horsepower hour and 0.22 grams per brake horsepower hour for TRUs that are rated equal or greater than 25 brake horsepower hour. Because brake horse power was left out of the emission factor calculations, the emission rates estimated for the TRUs are likely to be at least an order of magnitude too low. For example, at 24.9 brake horsepower hour, the emission rate would be approximately 7.5 grams per hour.

It also appears that TRUs are assumed to be rated less than 25 brake horsepower hour. It is unclear if this is a valid assumption. For example, the California Air Resources Board (ARB) assumed that typical TRU's would be 50 brake horsepower hour in the distribution center scenario of the Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles (RRP)<sup>1</sup>.

The emission factors and rates from the TRUs should be corrected in the Final HRA and the Final EIR and documentation should be provided to demonstrate that the TRUs are likely to be less than 25 brake horsepower. If no documentation can be provided, then the ARB assumption of 50 horsepower should be used.

Based on rough estimates using the input file in the appendix of the HRA, it appears that correcting the TRU emission rates would generate a carcinogenic health risk greater than 10 in one million. If the revision of the HRA by the lead agency results in a carcinogenic health risk greater than 10 in one million to nearby sensitive receptors, then, the lead agency should disclose this potentially significant impact. Additional mitigation should then be considered by the lead agency to reduce these health risks.

### Truck Route

4. Based on Table 2 (Project Traffic Generation) of the traffic study in the Draft EIR the project will generate at least an additional 500 truck trips per day on the designated truck route to the 210 Freeway. This truck route is directly adjacent to residences and the Jerry Eaves Park; however, the lead agency did not evaluate the potential impacts from the truck route in the HRA. Therefore, the AQMD staff recommends that the lead agency revise the HRA to include any potential health risk impacts to the adjacent housing and park from trucks traveling between the 210 Freeway and the project site.

---

<sup>1</sup> (<http://www.arb.ca.gov/diesel/documents/rrpapp.htm>).

### Percent Running Time for TRU's

5. In Table C of the Health Risk Assessment, the Percent Running Time for TRU's appears to be determined by multiplying the TRU idling time (30 minutes) by the number of TRU's operating at each dock, and then dividing by the total number of minutes in one day. This Percent Running Time is then used to determine the diesel exhaust emission rate for use in the ISCST3 model. This approach may underestimate impacts from project operations by assuming that idling can occur during any period in a 24-hour day. However, in Table 3-1 of the Draft EIR, the project facilities are scheduled to operate only from 6 am to 8 pm. As the meteorological conditions may vary considerably during night time conditions, AQMD staff recommends that the lead agency use the EMISFACT function of the ISCST3 model to vary the emissions by hour of day. The emission rate should also be scaled up to match the reduced operating hours. This adjustment should be made to both the HRA and operational LST analysis model runs.

### Site Configuration

6. Based on AQMD staffs' estimate (including increased TRU emissions), it appears that the highest diesel exhaust concentration would be located northeast of the proposed project at the park. AQMD staff recommends that loading docks be required to be located on the sides of the buildings that are away from downwind receptors (e.g., the east side appears to be the downwind direction, so loading docks should be placed on the west side of building on the east side of the proposed project property).

In addition AQMD staff recommends that the lead agency evaluate the impacts from placing a truck entrance on the northwest side of the property for more direct access to Ayala Drive. If this alternative is found to be environmentally superior, the lead agency should consider requiring its use as part of the project description or as a mitigation measure.

### Idling Stack Diameter

7. The stack diameter for idling stacks is 0.01 meters in the HRA (page 7) but was modeled as 0.1 meters in ISCST3 (see input file in appendix of HRA). The diameter of 0.1 meters in ISCST3 is similar to the diameters used by ARB for emergency and prime engines in the RRP. The text of the HRA should be corrected to reflect the diameter of 0.1 meters used in the air dispersion modeling.

## **OPERATIONAL AIR QUALITY AND HEALTH RISK IMPACT MITIGATION**

### Electrical Hookups

8. Given the regional significant air quality impacts from the proposed project and its potential local risks based on the previous comments the AQMD staff requests that the lead agency revise MM5.10-6 to the following:

The applicant shall provide an electrical hookups for each truck bay at the project site ~~trucks that need to cool their load on the project site during the on-going operations of the proposed project.~~

#### Siting of Sensitive Land Uses

9. In the event that the lead agency's revised HRA requested in previous comments demonstrates that operation of the project would generate significant carcinogenic risks the AQMD staff recommends that the lead agency review the California Air Resources Board's Air Quality and Land Use Handbook: A Community Perspective (CARB Handbook). The CARB Handbook offers specific guidance on the siting of incompatible land uses and "sensitive land uses" (e.g., residences, parks and medical facilities) near industrial sources, high traffic freeways and roads. Specifically, AQMD staff requests that the lead agency implement mitigation measures consistent with CARB's advisory recommendations and their respective source categories in the CARB Handbook.

#### Warehouse/Distribution Center Operational Mitigation Measures:

10. The AQMD recommends that the lead agency consider adding the following mitigation measures to reduce air quality and health risk impacts from the operation phase of the proposed project, if feasible:
  - ❖ Restrict truck activity at the project site during periods of heavy use at the park, such as weekends.
  - ❖ Design warehouse/distribution centers such that entrances and exits discourage that trucks from traversing past neighbors or other sensitive receptors.
  - ❖ Design warehouse/distribution centers 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.
  - ❖ Develop, adopt and enforce truck routes both for entering and leaving the city and in and out of facilities; keeping in mind common pedestrian routes, especially for schools.
  - ❖ Establish area(s) within the facility for repair needs.
  - ❖ 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 stores on warehouse/distribution center sites 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.
- ❖ Require or provide incentives for diesel particulate traps that meet CARB certified level 3 requirements.
- ❖ Electrify service equipment at facilities.

## **CONSTRUCTION AIR QUALITY IMPACTS**

### Vendor Trip Length for Construction Emissions Calculations

11. The lead agency states that an “economy of scale” is assumed for the vendor trip rate during project construction, resulting in a reduced trip rate from 0.38 trips per 1,000 square feet to 0.25 trips per 1,000 square feet during the construction phase of the project. However, the lead agency fails to provide adequate technical data to demonstrate the proposed project’s trip activities during construction. Therefore, AQMD staff requests that the lead agency provides technical data that demonstrates the reduced vendor trip rate of 0.25 trips per 1,000 square feet and require mitigation to enforce this project condition ensuring that the project does not create any additional adverse air quality impacts.

## **CONSTRUCTION AIR QUALITY MITIGATION**

### Mitigation to Restrict Maximum Soil Disturbance During Project Construction

12. On page 5.10-25 of the Draft EIR the lead agency analyzes the project’s emissions during grading activities. Based on the URBEMIS2007 output sheets provided in Appendix A of the Draft EIR the lead agency assumed that only 7.85 acres of land will be disturbed on a daily basis during the grading phase of the project. However, the lead agency does not include any provisions or requirements to limit the project’s construction activity to 7.85 acres per day. Therefore, AQMD staff requests that the lead agency require a mitigation measure that limits the project’s construction activity to 7.85 acres or less per day.

### Construction Mitigation Measures

13. Given that the lead agency’s localized construction air quality analysis demonstrates that criteria pollutant emissions from the project exceed the AQMD’s daily significance threshold for PM10 the AQMD recommends that the lead agency consider adding the following mitigation measures to further reduce air quality impacts from the project, if feasible:
  - ❖ Install wheel washers where vehicles enter and exit the construction site onto paved roads or wash off trucks and any equipment leaving the site each trip.

- ❖ Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation.
- ❖ Replace ground cover in disturbed areas as quickly as possible.
- ❖ Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 mph.
- ❖ Covered all trucks hauling dirt, sand, soil, or other loose materials.
- ❖ Pave road and road shoulders.
- ❖ Sweep streets at the end of the day if visible soil is carried onto adjacent public paved roads (recommend water sweepers with reclaimed water).
- ❖ Consistent with measures that other lead agencies in the region (including POLA and POLB) have enacted, require all on-site construction equipment to meet EPA Tier 2 or higher emissions standards according to the following:
  - ✓ April 1, 2010, to December 31, 2011: All offroad diesel-powered construction equipment greater than 50 hp shall meet Tier 2 offroad emissions standards. In addition, all construction equipment shall be outfitted with the BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 2 or Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
  - ✓ January 1, 2012, to December 31, 2014: All offroad diesel-powered construction equipment greater than 50 hp shall meet Tier 3 offroad emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
  - ✓ Post-January 1, 2015: All offroad diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
  - ✓ A copy of each unit's certified tier specification, BACT documentation, and CARB or AQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.



- ❖ For additional measures to reduce off-road construction equipment, refer to the mitigation measure tables located at the following website:  
[www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html).
- ❖ The lead agency should consider encouraging construction contractors to apply for AQMD “SOON” funds. As an example, incentives could be provided in the bidding process for those construction contractors who apply for AQMD “SOON” funds. The “SOON” program provides up to \$60 million dollars to accelerate clean up of off-road diesel vehicles, such as heavy duty construction equipment. More information on this program can be found at the following website:  
<http://www.aqmd.gov/tao/Implementation/SOONProgram.htm>