South Coast
Air Quality Management District
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Draft Environmental Impact Report (Draft EIR) for the Proposed Temple Palms Business Park (SCH# 2008071135)

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document. The AQMD would also like to thank the lead agency for the additional time to submit comments. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final CEQA document.

In the Draft EIR, the lead agency proposes construction of an approximate 502,386 square foot business park that would include light industrial, commercial, and warehouse facilities. Located just west of the project site are sensitive receptors (residences) and the proposed site plan includes warehouse uses on both the east and west sides of the 26.8 total acre site. In the traffic study, the lead agency also estimates approximately 749 daily trips from diesel fueled trucks operating at the site. The AQMD staff is concerned that health risk effects from diesel equipment including on-road trucks operating at the project site have not been calculated in the Draft EIR and that lead agency has not demonstrated that project health risk effects are less than significant. Therefore, the AQMD staff recommends that the lead agency estimate these potentially significant adverse health effects and include its findings in the Final EIR. Lastly, the lead agency should consider additional measures to mitigate any identified significant air quality impacts during operation or construction of the project. Details regarding these comments are attached to this letter.

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 Environmental Impact Report. The AQMD staff is available to work with the Lead Agency to address these issues and any other air quality questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

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

Attachment

IM:GM

LAC110503-01
Control Number

Operational Air Quality Impacts

1. Diesel particulates have been designated as a carcinogen by the state Air Resources Board and it appears that the proposed project will increase diesel particulate emissions at this site from trucks queuing and idling. The lead agency concludes that the proposed project would not result in a significant impact for toxic air contaminants by referring to the screening level distance between sensitive receptors and distribution center emission sources in the California Air Resources Board (CARB) Air Quality and Land Uses Handbook (CARB Handbook[1]). In this advisory, the CARB Handbook recommends a distance of 1,000 feet between the emissions source and sensitive receptors for distribution centers that accommodate more than 100 trucks per day. Sensitive receptors, i.e., residences, are located just west of the proposed site and the proposed project also includes 749 daily truck trips. The lead agency's conclusion that toxic impacts from diesel emissions are less than significant therefore may be incorrect without additional substantial evidence. The lead agency should prepare a health risk assessment to determine the potential significance of this project. The AQMD has developed a methodology for estimating cancer risks from mobile sources in a document entitled Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions.[2]

Operational Mitigation Measures

2. Given that the lead agency's regional operational air quality analysis demonstrates that criteria pollutant emissions from the project exceed the AQMD's daily significance threshold for NOx, the AQMD staff further recommends the following change and additional measures (in addition to Mitigation Measures AQ-6, TR-1 and TR-2) that other lead agencies in the region (including Port of Los Angeles and Port of Long Beach) have enacted to further reduce air quality impacts from the project. These measures may also reduce any potentially significant impacts identified in the HRA recommended above.

   Recommended change:

   AQ-6:

   - Electrify all service equipment at the facility. Electrical power sources shall be provided for ~~service equipment and~~ docking of trucks including trucks that need to cool their load, if these are allowed in the future; to minimize idling emissions.

[1] http://www.arb.ca.gov/ch/handbook.pdf

[2] http://aqmd.gov/ceqa/handbook/mobile_toxic/diesel_analysis.doc

Recommended Additions:

- Restrict operation to "clean" trucks by implementing a program requiring the use of 2010 and newer diesel haul trucks;[3]
- If trucks older than 2007 model year will be used at the facility, within one year of signing a lease, require tenants of the project to apply in good faith for diesel truck replacement/retrofit grant programs such as those offered by AQMD or ARB and to use those funds if awarded;
- Create a buffer zone of at least 300 meters (roughly 1,000 feet), which can be office space, employee parking, greenbelt, etc. between the areas with truck activity and sensitive receptors;
- Design the proposed project site such that entrances and exits discourage trucks from 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;
- Post signs outside of the facility providing a phone number where neighbors can call if there is a specific issue;
- 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;
- Re-route truck traffic by restricting truck traffic on certain sensitive routes;
- Require or provide incentives for particulate traps that meet CARB certified level 3 requirements;
- Improve traffic flow by signal synchronization;
- Develop, adopt and enforce truck routes away from sensitive receptors both in an out of city and in and out of facilities;

[3] An example clean truck program for a similar project approved by another lead agency can be found here (beginning on page 183 of 254):

http://www.ci.banning.ca.us/archives/30/July%2013,%202010%20City%20Council%20Agenda.pdf

- 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;
- Improve traffic flow by signal synchronization;
- Use water sweepers that comply with SCAQMD Rules 1186 and 1186.1;
- Require or provide incentives to use low sulfur diesel fuel with particulate traps; and
- Alternative fueled off-road equipment.

Construction Mitigation Measures

3. Given that the lead agency's construction air quality analysis demonstrates that criteria pollutant emissions from the project exceed the AQMD's daily significance threshold for ROG, NOx, CO, PM10 and PM2.5 the AQMD staff recommends that the lead agency replace mitigation measure AQ-5 with measures that other lead agencies in the region (including Port of Los Angeles and Port of Long Beach) have enacted and also recommends additional mitigation measures to further reduce air quality impacts from the project, if feasible:

- April 1, 2010, to December 31, 2011: All off-road diesel-powered construction equipment greater than 50 hp shall meet Tier 2 off-road 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 off-road diesel-powered construction equipment greater than 50 hp shall meet Tier 3 off-road 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 off-road 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.

- Use required coatings and solvents with a VOC content lower than required under Rule 1113;
- Construct/build with materials that do not require painting;
- Use pre-painted construction materials; and
- Contractors shall use varying-pressure-low-volume (HPLV) paint applicators or other application techniques with equivalent or higher transfer efficiency.

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.