



South Coast
Air Quality Management District

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

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April 27, 2012

Ms. Nancy Fong, AICP, nfong@cityofbell.org
Interim Community Development Director
Community Development Department
City of Bell
6330 Pine Avenue
Bell, CA 90201

Draft Mitigated Negative Declaration (Draft MND)
for the Proposed Bandini Industrial Center

The South Coast Air Quality Management District (AQMD) staff 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 the Final CEQA document. The AQMD staff also appreciates the opportunity to speak with lead agency staff and consultants concerning the Draft CEQA document. In the project description, the lead agency proposes the demolition of an existing 85,500 square foot building and the construction of a 536,400 square-foot warehouse, manufacturing and office building with associated parking on a 21.26 acre site. Construction is scheduled to begin in mid-2012 and completed by early 2013.

Based on its review of the air quality analysis, the AQMD staff has concerns that a non-default vehicle trip rate and vehicle fleet mix percentage were used to estimate project operational mobile source emissions without substantial evidence supporting its use such as project specific information or conditions. The AQMD staff has additional concerns about the truck trip lengths used to estimate emissions from trucks serving the proposed facility. Based on these concerns, the project emissions from trucks engaged in goods-movement activities could be significantly underestimated. Therefore, further justification of the air quality analysis parameters and/or adjustment of the air quality analysis is recommended along with additional mitigation measures to reduce these impacts. Additional comments are included in the attachment.

Ms. Nancy Fong, AICP,
Interim Community Development Director

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Please provide the AQMD staff with written responses to all comments contained herein prior to the adoption of the Final MND. The AQMD staff is available to work with the Lead Agency to address these issues and any other 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

IM:GM
Attachment

LAC120330-03
Control Number

Air Quality Analysis - Operations

1. In the air quality analysis, the lead agency estimated project air quality impacts using the California Emissions Estimator Model (CalEEMod) land use software. In the land use operational inputs to the model, the lead agency assumed an overall trip rate of 3.56 trips per 1,000 square feet of building area for the land use warehousing (Land Use Code 150). Based on the project description of the proposed building and review of Appendix E (Technical Source Documentation) in the CalEEMod User's Guide, the trip rate for this land use appears to more closely represents a high-cube warehouse (Land Use Code 152). Based on the CalEEMod User's Guide (Appendix E), the default, overall trip rate would then be 2.59 trips per 1,000 square feet. By using the 2.59 default trip rate the overall number of trips would be reduced. However, the recommended percentage of trucks shown in the Appendix E (40 percent) is higher than what is assumed in the Draft MND (20 percent, with no more than five percent tractor trailers). This results in a potentially significant underestimation of trucks that could use this facility on a peak day. For example, the Draft MND assumes 382 truck trips per day while the default CalEEMod parameters yield 556 trucks per day. As diesel trucks have significantly higher emissions of NO_x and PM compared to light duty vehicles, this difference in truck counts could result in a significant underestimation of air quality impacts.

The AQMD staff therefore recommends that the operations modeling analysis be revised in the Final MND to reflect the CalEEMod User's Guide default trip rate and the recommended warehouse vehicle fleet mixture. If the trip rate used in the Draft MND's air quality analysis remains unchanged in the Final MND, then the lead agency should either provide additional project-specific information justifying the lower rate, or a condition that limits the number of trucks to what was analyzed in the Draft MND.

2. In the CalEEMod input files provided to AQMD staff by the lead agency, a one-way default trip length of 7.3 miles was used to estimate operational air quality impacts for trucks moving goods for the proposed facility. Since trucks operating from the proposed project may handle goods coming directly from the port areas as well as potentially serving out of state destinations, the trip lengths could be measured as far as the Basin's boundaries as well as from the closer port areas. In a phone conversation with the project consultants, the 7.3 mile trip length was justified because it is the average commercial-commercial length for all vehicle types in the South Coast Air Basin (SCAB). However, because of this specialized goods-movement land use, the truck specific trip length from the 2012 Regional Transportation Plan (RTP) is more appropriate (18.6 miles for Los Angeles County). If the lead agency is uncertain of the types of tenants or the trip lengths, the lead agency could limit activities, as a condition of a tenant's occupancy, to levels described in the analysis. Otherwise, long-term project air quality impacts for operations will be substantially underestimated.

Operational Mitigation Measures

3. In the event the lead agency determines that air quality impacts from project operations will exceed recommended regional thresholds, the AQMD staff recommends that the lead agency consider the following additional mitigation measures. Other lead agencies that have used these measures include the City of Banning¹, Riverside County², City of San Bernardino³, and the San Pedro Bay Ports⁴, among others.
 - At project start, all heavy duty trucks entering the property must meet or exceed EPA 2007 engine emission standards.
 - Beginning in 2015, all heavy duty trucks entering the property must meet or exceed 2010 engine emission standards.
 - If the above clean truck requirements are infeasible, a phase-in schedule should be put forth that will feasibly achieve emission reductions as soon as possible. Should an alternative schedule be found necessary, the AQMD staff should be consulted to identify a different schedule.
 - The facility operator will maintain a log of all trucks entering the facility to ensure that on average, the daily truck fleet meets that emission standards listed in the Draft MND. This log should be available for inspection by city staff at any time.
 - The facility operator will ensure that site enforcement staff in charge of keeping the daily log and monitoring for excess idling will be trained/certified in diesel health effects and technologies [for example, by requiring attendance at CARB approved courses (such as the free, one-day Course #512)].
 - Limit the daily number of trucks allowed at each facility to levels analyzed in the Final MND.
 - Require at least a portion of the fleet to utilize alternative fueled technologies.
 - Prohibit all vehicles from idling in excess of five minutes, both on- and off-site.
 - At a minimum, require tenants upon occupancy that do not already operate 2007 and newer trucks to apply in good faith for funding to replace/retrofit their trucks, such as Carl Moyer, VIP, Prop 1B, or other similar funds. Should funds be awarded, the tenant should also be required to accept and use them.
 - Require facility operator to become SmartWay Partner upon start of operations.
 - Require facility operator to incorporate incentives and requirements such that the maximum feasible number of truck trips (e.g., 90%) will be carried by SmartWay 1.0 or greater carriers within the shortest timeframe possible (e.g., three years).

¹ Banning Business Park

<http://banning.ca.us/archives/30/July%202013,%202010%20City%20Council%20Agenda.pdf>

² Mira Loma Commerce Center

http://www.rctlma.org/online/content/conditions_of_approval.aspx?PERMITNO=pp17788

³ Palm/Industrial Distribution Center <http://www.ci.san-bernardino.ca.us/civica/filebank/blobdload.asp?BlobID=11793>

⁴ Clean Trucks Program <http://www.cleanairactionplan.org/cleantrucks/>