



South Coast Air Quality Management District

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Draft Mitigated Negative Declaration (Draft MND) for the Proposed Agua Mansa Logistics Center (DAP 001-104 Tentative Parcel Map No. 19471)

The South Coast Air Quality Management District (SCAQMD) 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.

In the project description, the Lead Agency proposes the construction of a 808,500 square foot high-cube warehouse distribution facility on an approximately 40.49 acre site for occupants that are not known at this time. Construction is estimated to take about two years to complete beginning in early 2014 with opening year scheduled for 2016.

The project contains a unique mitigation measure that requires a natural gas fueling station to be constructed onsite. Natural gas trucks have much lower diesel particulate emissions than their diesel-fueled counterparts and SCAQMD staff appreciates the project's commitment to enhancing the area's infrastructure in this regard. However, it is not clear how this mitigation is quantified in the Draft MND. As there is no requirement that any natural gas-fueled trucks will actually serve this facility, the Draft MND's assumption that 20% of the trucks that travel to/from this warehouse is not supported. Further, it is not clear that the natural gas-fueled truck emission factor used in the air quality analysis is applicable to California truck fleets.

Further, in the traffic impact analysis, the Lead Agency shows that inbound and outbound truck routes along Rancho Avenue and La Cadena Drive pass by sensitive receptors (single family residences). The SCAQMD staff is concerned that the project's truck emissions may potentially create significant health risks to those living in these residences. In order to avoid this risk, it appears that trucks may be able to use Riverside Drive to access the I-10 freeway while only passing industrial land uses along the way. SCAQMD staff recommends that the lead agency investigate using this alternate truck route rather than the route specified in the Draft MND. We note that a Health Risk

Assessment was not prepared to determine the potential health risks to residents located along the truck route.

In addition, in the traffic impact analysis a non-default trip rate is used in the air quality model that estimates that 277 of the total vehicle trips would be made by trucks each day. Using the guidance for the CalEEMod land use computer software, the number of daily truck trips could be higher than 800 per day. Because a tenant has not yet been specified, this higher trip rate should be used, otherwise impacts could potentially exceed significance thresholds once a tenant and actual truck trip volume is identified, triggering need for additional CEQA review. If the non-default trip rate and fleet mixture percentages are used in the Final MND, the SCAQMD staff recommends that the estimated emissions limits be enforced as a condition of occupancy to ensure that regional and health impacts do not exceed the air quality impacts estimated in the Final CEQA document.

Finally, if the Lead Agency determines that operational air quality or health effect impacts are significant, additional mitigation measures should be incorporated into the Final MND to reduce any air quality impacts below significance levels. Details are included in the attachment.

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final CEQA document. The SCAQMD 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
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Planning, Rule Development & Area Sources

IM:GM

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Control Number

Alternative Fueled Trucks

1. The Draft MND assumes that 20% of the trucks serving the project will be natural gas fueled due to the requirement that a natural gas fueling station be placed onsite (MM AQ-5). Although natural gas-fueled trucks may have lower diesel particulate matter emissions than their diesel-fueled counterparts, additional information is needed to substantiate the conclusions about reduced emissions in the Draft MND. For example, MM AQ-5 states that the fueling station could include a slow-fill station. If this is the case, it is not clear that there will be sufficient incentive for natural gas-fueled trucks to visit the facility, as they may not be able to feasibly fuel up at this destination. Further, even with a fast fill station, it is not clear that 20% of the trucks serving the facility will be natural gas-fueled absent other incentives or requirements.

In addition, the assumption that there could be a 49% reduction in NO_x for natural gas-fueled trucks is based on data that may not be applicable to trucks in California. For example, by the time the project is operational, a substantial proportion of the truck fleet in the state will meet 2010 emission standards, which include significant NO_x controls (such as SCR technology). To study this issue, SCAQMD recently conducted some limited tailpipe sampling to determine potential emission reductions from natural gas trucks and found less than the 49% reductions cited.¹ Further, because natural gas trucks must meet the same emission standards as diesel trucks, EMFAC 2011 currently assumes no reduction in NO_x between the two technologies. This assumed reduction in emissions should be further justified prior to assuming that the mitigation will be as effective as claimed.

Air Quality Analysis - Operations

Non-Default Trip Rate and Fleet Mixture Percentage

2. In the CalEEMod analysis to estimate project air quality impacts, the Draft MND overrode the default trip rate of 2.59 trips per 1,000 square feet of building space for the high-cube warehouse land use. Instead, the Draft MND used a trip rate of 1.68 per 1,000 square feet (Land Use Code 152) based on the ITE Trip Generation Manual (2012), 9th Edition. Using the 1.68 non-default trip rate, the Draft MND estimated that approximately 277 truck would visit the site daily compared with 837 daily trucks using the default 2.59 trip rate and 40% truck mix recommended in the CalEEMod User's Guide as a high end estimate.² Further, in the Traffic Impact Analysis,³ the proposed project assumes that only 20.43 percent of the proposed project's total trips are generated by trucks. Absent an occupant specific traffic study and given the possibility that a prospective occupant could have greater truck activity levels than analyzed using the non-default assumptions, the SCAQMD staff recommends that project impacts be estimated using the CalEEMod guidance in order

¹ http://www.aqmd.gov/hb/attachments/2011-2015/2013Mar/SpecMtgAttach/3_Testing_OnRoad_HD_Vehicles.pdf

² CalEEMod User's Guide, Appendix E, Large Warehouse and Distribution Center Trip Rates

³ Table 2 - Project Trip Generation, Traffic Impact Analysis (Kunzman Associates, Inc., September 10, 2013)

to avoid underestimating operational impacts.

Should the Lead Agency choose to use the lower trip rate and fleet mixture, then project conditions of occupancy should be added to ensure that the project is limited to the specified emissions estimate using the lower numbers of trucks analyzed in the air quality analysis. Without this condition or a more conservative analysis, the project may be subject to additional CEQA review if a future tenant has higher emissions. As the project's NOx emissions are already close to significance thresholds, only a slight increase may yield a significant impact.

Mitigation Measures for Operational Air Quality Impacts (Mobile Sources)

3. If significant air quality impacts are identified after considering comments from above, the lead agency should evaluate the feasibility of the following mitigation measures:
 - a. Require the use of 2010 compliant diesel trucks, or alternatively fueled trucks upon project build-out. If this isn't feasible, consider other measures such as incentives, phase-in schedules for clean trucks, etc.
 - b. Re-Route truck traffic by restricting truck traffic on certain sensitive routes. For example, the truck route specified in the Draft MND sends trucks adjacent to residents along Rancho Avenue. Riverside Avenue appears to be just as short a route to the freeway as Rancho Avenue, and it only passes by industrial land uses. Trucks should be prohibited from using Rancho Avenue to protect residents along that route and they should instead be routed through industrial areas wherever feasible.
 - c. Have truck routes clearly marked with trailblazer signs, so that trucks will not enter residential areas.
 - d. Develop, adopt and enforce truck routes both in and out of city, and in and out of facilities.
 - e. Prohibit all vehicles from idling in excess of five minutes, both on- and off-site.
 - f. Improve traffic flow by signal synchronization.
 - g. Promote clean truck incentive programs, and

Electric Vehicle (EV) Charging Stations

4. Trucks that can operate at least partially on electricity have the ability to substantially reduce the significant NOx impacts from this project. Further, trucks that run at least partially on electricity are projected to become available during the life of the project as discussed in the 2012 Regional Transportation Plan. It is important to make this electrical infrastructure available when the project is built so that it is ready when this technology becomes commercially available. The cost of installing electrical charging equipment onsite is significantly cheaper if completed when the project is

built compared to retrofitting an existing building. Therefore, the SCAQMD staff recommends the Lead Agency require the proposed warehouse and other plan areas that allow truck parking to be constructed with the appropriate infrastructure to facilitate sufficient electric charging for trucks to plug-in. Similar to the City of Los Angeles requirements for all new projects, the SCAQMD staff recommends that the Lead Agency require at least 5% of all vehicle parking spaces (including for trucks) include EV charging stations⁴. Further, electrical hookups should be provided at the onsite truck stop for truckers to plug in any onboard auxiliary equipment. At a minimum, electrical panels should appropriately sized to allow for future expanded use.

Mitigation Measures for Operational Air Quality Impacts (Other Area Sources)

5. In addition to the mobile source mitigation measures identified above the Lead Agency should incorporate the following onsite area source mitigation measures below to reduce the project's regional air quality impacts from NOx emissions during operation, if further revisions to the air quality impact analysis prove that operational NOx impacts are significant. These mitigation measure should be incorporated pursuant to CEQA Guidelines §15126.4
 - a. Maximize use of solar energy including solar panels; installing the maximum possible number of solar energy arrays on the building roofs and/or on the Project site to generate solar energy for the facility.
 - b. Require all lighting fixtures, including signage, to be state-of-the art and energy efficient, and require that new traffic signals have light-emitting diode (LED) bulbs and require that light fixtures be energy efficient compact fluorescent and/or LED light bulbs. Where feasible use solar powered lighting.
 - c. Maximize the planting of trees in landscaping and parking lots.
 - d. Use light colored paving and roofing materials.
 - e. Utilize only Energy Star heating, cooling, and lighting devices, and appliances.
 - f. Install light colored "cool" roofs and cool pavements.
 - g. Limit the use of outdoor lighting to only that needed for safety and security purposes.
 - h. Require use of electric or alternatively fueled sweepers with HEPA filters.
 - i. Use of water-based or low VOC cleaning products.

⁴http://ladbs.org/LADBSWeb/LADBS_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf