South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL AND USPS:
zabubakar@fontana.org

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Zai AbuBakar, Planning Manager
City of Fontana, Planning Division
8353 Sierra Avenue
Fontana, CA 92335

Draft Environmental Impact Report (DEIR) for the Proposed Sierra Lakes Commerce Center Project

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 the Final CEQA document.

The proposed Project is the construction of a concrete tilt-up logistics warehouse building totaling approximately 597,818 square feet on approximately 23.15 acres. Based on recommended guidance from the Institute of Transportation Engineers (ITE),[1] the proposed Project could have as many 1,005 total daily vehicle trips including 383 trucks operating daily. In the Air Quality Section, the lead agency quantified the project's construction and operation air quality impacts and has compared those impacts with the SCAQMD's recommended regional and localized daily significance thresholds. Based on its analyses, the lead agency has determined that construction air quality impacts will exceed the recommended regional daily significance threshold for VOC and operational daily air quality impacts for NOx. Construction VOC emissions will be mitigated to less that significant while operational emissions are significant and unavoidable.

SCAQMD staff has concerns about the significant adverse long-term air quality impacts estimated in the DEIR to existing sensitive receptors (residences) near the proposed Project site and along truck routes from high truck activities described in the air quality and traffic analyses. The SCAQMD staff therefore recommends that all feasible mitigation measures including a 1,000 foot buffer between the on-site truck activities and the sensitive receptors be incorporated into the final Project and Final EIR to reduce these impacts. The SCAQMD staff also has concerns about the assumptions used in the modeling to estimate regional, localized and health effect impacts. Additional details are included in the attachment.

[1] ITE, 9th Edition, Land Use 152 High-Cube Warehouse/Distribution Center 152, Weekday Weighted Average Truck Trip Generation Rate of 0.64 trip ends per 1,000 square feet.

Pursuant to Public Resources Code Section 21092.5, SCAQMD staff requests that the lead agency provide the SCAQMD 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 Jack Cheng, Air Quality Specialist, at (909) 396-2448, if you have any questions regarding the enclosed comments.

Sincerely,

Jillian Wong

Jillian Wong, Ph.D.
Program Supervisor
Planning, Rule Development & Area Sources

Attachment
JW:JC
SBC150625-09
Control Number

Siting of an Incompatible Land Use

1. The SCAQMD staff is concerned that the existing sensitive receptors will be exposed to significant regional and localized operational impacts, mostly from the daily truck activities that will likely operate using diesel fuel. Based on information in the DEIR (air quality analyses, the project truck distribution, and by aerial map inspection), the lead agency shows a minimum distance of 25 meters to the nearest sensitive receptor; a residence located west of the project site. [2]

   Although approved as designated truck routes in the lead agency's Circulation Element in its General Plan, project truck traffic will pass by sensitive receptors daily using Sierra Avenue to access the Interstate 210 and Interstate 15 Freeways. As a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land-use decision making process, the California Air Resources Board (CARB) has provided the CARB Air Quality and Land Use Handbook (CARB Land Use Handbook). Based on guidance from the CARB Land Use Handbook, CARB recommends a buffer of at least 1,000 feet between land uses that will have 100 or more trucks per day. [3]

   In accordance with the state CEQA Guidelines §15126.4 (a)(1)(D), the lead agency should discuss the proposed siting of this land use and any potential impacts resulting from any proposed mitigation related to the CARB Land Use Handbook guidance in the Final EIR.

Health Risk Assessment (HRA)

2. The lead agency used AERMOD (version 14134) to prepare the dispersion modeling for the Health Risk Assessment (HRA) and meteorological data from the Fontana Station (font6). At the time of modeling (3/5/2015), meteorological data font8 was available for the Fontana Station. SCAQMD staff recommends that the lead agency revise the model using the latest meteorological data.

3. Source ID SLINE3 and SLINE4 ("on-site travel") should extend to and from the ingress and egress of the project site. By not extending the "on-site travel" sources, emissions are underestimated. SCAQMD staff recommends that the lead agency revise the model using appropriate source placement.

4. The HRA analysis involved the use of separate discrete receptors placed randomly. SCAQMD staff recommends that the lead agency revise the HRA using a receptor grid of no more than 100-meter spacing over the existing residences and areas zoned or planned for residential development. Furthermore, receptor locations should be placed at the boundaries of the residential property and not the residential structure. Placing receptors along the residential structure underestimates cancer impacts to the residents. SCAQMD staff

[2] Mobile Source Health Risk Assessment

[3] CARB Air Quality and Land Use Handbook: http://www.arb.ca.gov/ch/handbook.pdf . Guidance is for siting new sensitive land uses within 1,000 feet of a distribution center, Page 4. The buffer is a neutral mitigation measure provided to minimizes truck activity emission impacts to sensitive receptors. Besides truck activity of more than 1,000 trucks per day, this guidance applies to distribution centers that accommodate more than 40 transport refrigeration units per day or where TRU operations will exceed 300 hours per week truck activities and sensitive receptors, Page 4.

recommends that the lead agency revise the model using appropriate receptor grids and locations.

5. SCAQMD staff recommends that the lead agency revise the Health Risk Assessment (HRA) to include a receptor grid of no more than 100-meter spacing placed over the entire school property (includes classrooms, stadium, baseball fields, etc) in order to properly analyze and characterize the cancer risk impacts to the school. Additionally, the receptor grid should begin along the school boundaries.

6. In the HRA, the lead agency identified the various schools as "school receptors" and used a nine-year exposure duration. However, worker receptors (teachers and administrative staff, etc.) were not identified in the HRA. Worker receptors placed on school property should therefore be identified and evaluated for a 40-year exposure period in the Final EIR.

7. The lead agency used the Terrain Height Option "Non-Default Regulatory Option – Flat." SCAQMD staff recommends that the lead agency revise the Health Risk Assessment (HRA) using the Regulatory Default Option "Elevated" or provide additional justification for the use of "Non-Default Regulatory Option."

Use of Un-Refrigerated Warehouse Without Rail Land Use Model Input

8. Based on a review of the project's emissions calculations in Appendix A: Air Quality Analysis (CalEEMod Output Sheets), the lead agency determined the proposed Project's air quality impacts using emission factors for unrefrigerated warehouses/truck activity. However, the DEIR states the proposed buildings could house a tenant that uses cold storage. The SCAQMD staff therefore recommends that the lead agency revise the air quality analysis to account for emissions from refrigerated warehouse uses.

Mitigation Measures for Construction Air Quality Impacts

9. Recommended Changes:

MM AIR-1: Only "Zero-Volatile Organic Compounds" paints (no more than 100 grams/liter of VOC) or ~~High Pressure Low Volume (HPLV)~~ High Volume Low Pressure (HVLP) applications consistent with the South Coast Air Quality management District Rule 1114 shall be used.

Mitigation Measures for Operational Air Quality Impacts (Mobile Sources)

10. Because the California Air Resources Board has classified the particulate portion of diesel exhaust emissions as carcinogenic and during project operations, the lead agency has determined that project operation emissions are significant for Volatile Organic Compounds (VOC) and Oxides of Nitrogen (NOx), primarily from truck activity emissions, the SCAQMD staff therefore recommends the following changes and additional measures that should be incorporated in the Final EIR to reduce exposure to sensitive receptors and reduce potential significant project air quality impacts:

Recommended Changes:

Mitigation AIR-2M

- All on-site forklifts shall be non-diesel and shall be powered by electricity, compressed natural gas, or propane. ~~if technically feasible~~.

Mitigation AIR-2h

- The Applicant shall provide a minimum of ~~two~~ eleven (5% of 218 parking spaces including trucks) electric vehicle charging stations.

Discussion

- 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 stations[4]. 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.

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

Additional Mitigation Measures:

- Provide minimum buffer zone of 300 meters (approximately 1,000 feet) between truck traffic and sensitive receptors.
- Limit the daily number of trucks allowed at each facility to levels analyzed in the Final EIR. If higher daily truck volumes are anticipated to visit the site, the lead agency should commit to re-evaluating the project through CEQA prior to allowing this higher activity level.
- Design the site such that any check-in point for trucks is well inside the facility to ensure that there are no trucks queuing outside of the facility.
- Provide food options, fueling, truck repair and or convenience stores on-site to minimize the need for trucks to traverse through residential neighborhoods.
- Improve traffic flow by signal synchronization.
- Should the proposed Project generate significant regional emissions, the lead agency should require mitigation that requires accelerated phase-in for non-diesel powered trucks. For example, natural gas trucks, including Class 8 HHD trucks, are commercially available today. Natural gas trucks can provide a substantial reduction in health risks, and may be more financially feasible today due to reduced fuel costs compared to diesel. In the Final CEQA document, the lead agency should require a phase-in schedule for these cleaner operating trucks to reduce project impacts. SCAQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the lead agency and project applicant.