



South Coast Air Quality Management District

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FAXED: FEBRUARY 7, 2006

February 7, 2006

Mr. J. P. McGuckian
San Bernardino County
Land Use Services Department
385 North Arrowhead Avenue, First Floor
San Bernardino, CA 92415-0182

Dear Mr. McGuckian:

**Project No. P200500653/CUP: APN: 0292-054-17
(Applicant: The William Fox Group)**

The South Coast Air Quality Management District (SCAQMD) has received the Land Use Application Questionnaire along with the site plan for the above-mentioned project. Based on SCAQMD staff's review of the proposed project, potentially significant air quality impacts could be generated. As a result, it is recommended that the proposed project undergo a California Environmental Quality Act (CEQA) environmental analysis.

Please provide the SCAQMD with a copy of the draft CEQA document when it is available for public review. The SCAQMD would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Charles Blankson, Ph.D., Air Quality Specialist – CEQA Section, at (909) 396-3304 if you have any questions regarding these comments.

Sincerely

Steve Smith, Ph.D.
Program Supervisor, CEQA Section
Planning, Rule Development & Area Sources

Attachment

SS: CB

SBC060201-04
Control Number

Project No. P200500653/CUP: APN: 0292-054-17
(Applicant: The William Fox Group)

1. **Project Air Quality Emissions:** The proposed project involves the construction of a 104,000 square-foot warehouse and a 5,000 square-foot office on 4.4 acres. During construction site grading will be necessary and 7,500 cubic yards of earth will be cut and 4,500 cubic yards of fill will be necessary.

To quantify potential emissions from construction and operation, it is recommended that the lead agency use the analysis methodologies in the SCAQMD's 1993 CEQA Air Quality Handbook (Handbook) or other approved methodologies. Alternatively, the lead agency may consider using California Air Resources Board (CARB) computer model URBEMIS 2002 to estimate the project's construction and operational emissions. The model can be obtained at the SCAQMD website: www.aqmd.gov/ceqa/models.html. If quantification of emissions reveals that the project's emissions exceed the established significance thresholds, then mitigation measures must be required by the lead agency to reduce those emissions to less than significance.

2. **Localized Impacts:** The questionnaire provides no description of surrounding land uses, so it is not clear if there are sensitive receptors close to the proposed project. If there are sensitive receptors in the vicinity of the proposed project, consistent with the SCAQMD's environmental justice program and policies, the SCAQMD recommends that the lead agency also evaluate localized air quality impacts to those receptors. Since the project is less than five acres in area, project construction has the potential to raise localized ambient concentrations. The methodology for conducting the localized significance thresholds analysis can be found on the SCAQMD website at: www.aqmd.gov/ceqa/handbook/LST/LST.html.

3. **Diesel Truck Emissions:** At buildout the warehouse will attract some amount of truck traffic. The land use Application Questionnaire indicates that the traffic study for the proposed project is attached. The traffic study was not attached so no data were provided regarding the volume of truck traffic and potential air quality impacts to sensitive receptors in the vicinity of the project. With the designation of diesel particulates as a carcinogen by the CARB, the health impacts of diesel particulates from truck traffic need to be assessed. The SCAQMD has prepared a methodology for performing an air toxics health risk analysis or truck emissions. This methodology can be accessed at the SCAQMD website at: www.aqmd.gov/ceqa/handbook/diesel_analysis.doc under Health Risk Assessment Guidance.

4. **Mitigation Measures:** If construction or operational air quality impacts from the proposed project are concluded to be significant, the following measures are recommended for the lead agency to consider where applicable or feasible:

- Maintain equipment and vehicle engines in good condition and in proper tune as per manufacturers' specifications.
- Require the use of alternative clean fuel such as compressed natural gas-powered equipment with oxidation catalysts instead of gasoline- or diesel-powered engines. However, where diesel equipment has to be used because there are no practical alternatives, the construction contractor should use particulate filters, oxidation catalysts and low sulfur diesel as defined in SCAQMD Rule 431.2, i.e., diesel with sulfur content of 15 ppm by weight or less. The low-sulfur diesel has the potential to reduce NO_x emissions by 50 percent.
- Use aqueous or emulsified diesel fuel for all construction equipment. Aqueous diesel formulations have received interim verification by the CARB and show a reduction of 16% in NO_x and 60% in PM10 from diesel exhaust. Information of aqueous diesel formulations can be found at the following websites:
www.arb.ca.gov/fuels/ddiesel/altdiesel/altdiesel.html,
www.lubrizol.co/PuriNox/markets_distributors.asp,
www.cleanfuelstech.com/Customers/Customers.htm.
- Use electricity from power poles instead of from temporary diesel- or gasoline-powered generators.
- Trucks hauling dirt, sand, gravel or soil are to be covered or should maintain at least two feet of freeboard in accordance with Section 23114 of the California Vehicle Code.
- Pave parking areas and construction access roads to the main roads to avoid dirt being carried on to the roadway.
- Restrict idling emissions by using auxiliary power units and electrification.
- Enforce truck parking restrictions.
- Restrict truck traffic on some routes.
- Provide a minimum of 300-meter buffer zone between truck traffic and sensitive receptors.
- Redirect truck route to avoid residential areas or schools.
- Improve traffic flow through signal synchronization.
- Provide electrical sources for service equipment and docking of trucks.
- Use light-colored roof materials to deflect heat.
- Install solar panels on roof to supply electricity for air conditioning.
- Use double-paned windows to reduce thermal loss.
- Install central water heating systems to reduce energy consumption, and
- Install energy-efficient appliances to reduce energy consumption.

Other mitigation measures for consideration by the lead agency can be found in Chapter 11 of the SCAQMD CEQA Handbook.