



South Coast Air Quality Management District

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FAXED: MARCH 17, 2006

March 17, 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. P200500723/CUP:
(Riverside Commercial Investors)**

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 Land Use Application Questionnaire prepared for 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

SBC060222-01
Control Number

Project No. P200500653/CUP
(Applicant: Riverside Commercial Investors)

1. **Project Air Quality Emissions:** The proposed project involves the construction of a 600,245 square-foot warehouse on 30.22 acres. According to the project description site grading will be required. Furthermore, 102,400 cubic yards of earth will be cut and 62,800 cubic yards of fill will be necessary. Based on this information, construction of the proposed project could generate significant adverse construction air quality impacts. Further, depending on the nature of the warehouse operations, the proposed project has the potential to generate significant adverse operational air quality impacts from worker trips and heavy-duty truck trips from transporting materials to and from the proposed facility.

To quantify potential emissions from construction and operation of the proposed project, 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. **Diesel Truck Emissions:** At buildout the warehouse could potentially attract a substantial amount of truck traffic. The Land Use Application Questionnaire indicates that the traffic study for the proposed project is being submitted to the County. A copy of the traffic study was not attached to the application to the SCAQMD so no data were provided regarding the volume of truck traffic and potential air quality impacts of the proposed 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.
3. **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.