



South Coast Air Quality Management District

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FAXED: MAY 19, 2006

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Orlando Hernandez
City of Fontana
Planning Department
8353 Sierra Avenue
Fontana, CA 92335

Dear Mr. Hernandez:

**Draft Environmental Impact Report (DEIR) for Home Depot Retail Center
Fontana: April 2006**

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 in the Final Environmental Impact Report.

SCAQMD staff is concerned that the lead agency has not provided an accurate description of the proposed project and, has therefore not accounted for all the proposed project's air quality impacts. SCAQMD staff recommends the project's emissions be revised to accurately reflect the proposed project's full air quality impacts in the Final EIR.

Please find attached additional comments regarding the proposed project. Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Environmental Impact Report. 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

Susan Nakamura
Planning and Rules Manager
Planning, Rule Development & Area Sources

Attachment

SN: CB
SBC060407-02
Control Number

**Draft Environmental Impact Report (DEIR) for
the Home Depot Retail Center Fontana: April 2006**

1. **Inconsistent Project Description:** There are several discrepancies in the project description which may lead to inaccurate projected emissions from the proposed project. For example, the project description on page 1-1 in the DEIR proposes the construction of a 138,958 square-foot warehouse-style home improvement center with a garden center and two smaller retail stores occupying a total of 10,963 square feet of retail space. The Air Quality Technical Report proposes a same sized home improvement center but only 6,638 square feet of retail space reserved for two fast food restaurants with drive-through. The URBEMIS 2002 output printout shows that the lead agency used only 6,330 square feet, out of a total retail space of 10,963 square feet, to estimate vehicle trips from the two fast food restaurants. Further, the project description in the DEIR makes no mention of a gas station, but on page 15 of the Air Quality Technical Report, the lead agency mentions a gas station as one of the proposed uses on the project site. SCAQMD staff therefore believes the emissions presented in the DEIR underestimate the proposed project's emissions. Please correct these discrepancies so as to present an accurate description of the proposed project as well as its air quality impacts in the Final EIR.
2. **SCAQMD Permit for Gas Station:** The Air Quality Technical Report indicated that the proposed project will include a gas station. SCAQMD Rules 201 and 203 require that gas/service stations apply for a permit to construct and operate. SCAQMD Rule 1401 – New Source Review of Toxic Air Contaminants, requires the health risk from the gas station not exceed 10 in one million if the gas station includes T-BACT. The lead agency needs to address these requirements in the Final EIR.
3. **Project Vehicle Trips:** If a gas station is one of the project components, then project-generated vehicle trips and emissions have been underestimated. The URBEMIS 2002 output printout shows vehicle trips and emissions from two fast food restaurants, but no vehicle trips or emissions from the gas station. Project-generated vehicle trips and emissions shown in Tables 4.2-8 and 4.2-9 on page 4.2-13 of the DEIR are underestimated because according to the Institute of Transportation Engineers Trip Generation Manual, Seventh Edition, a convenience market/store with gasoline pumps generates 845.6 vehicle trips per 1,000 square feet compared with 496.12 vehicle trips for a fast-food restaurant with drive-through. It is recommended that the lead agency rerun the URBEMIS 2002 with the revised project data and revise the project emissions tables accordingly in the Final EIR.
4. **Localized Impacts:** Consistent with the SCAQMD's environmental justice program and policies, the SCAQMD recommends that the lead agency also evaluate localized air quality impacts to nearby sensitive receptors, i.e., the residential

communities to the north, the east and to the south of the project site. SCAQMD staff recommends that for this project and for future projects, the lead agency undertake the localized analysis to ensure that all feasible measures are implemented to protect the health of nearby sensitive receptors. 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.

5. **Operational NO_x Mitigation Measures:** Operational NO_x emissions at buildout in 2007 exceed the significance threshold. However, since the NO_x emissions are projected to decline to less than significance by 2010, the lead agency proposes no mitigation measures to reduce the NO_x emissions. Given that the air basin is designated nonattainment, SCAQMD staff recommends that the lead agency consider implementing the following mitigation measures wherever feasible:

- Require the use of newer, lower-emitting trucks for the delivery of supplies to the facility.
- Require trucks to be offloaded promptly to prevent trucks idling for longer than five minutes in compliance with state law.
- Use light-colored roofing materials to deflect heat and conserve energy.
- Install solar panels on roofs to supply electricity for air conditioning.
- Install central water heating systems to reduce energy consumption.
- Install high energy-efficient appliances, such as water heaters, refrigerators, furnaces and boiler units.
- Use double-paned windows to reduce thermal heat.
- Install automatic lighting on/off controls and energy-efficient lighting.
- Require Home Depot management to provide flyers and pamphlets for truck drivers educating them on the health effects of diesel particulate and the importance of being a good neighbor.