



South Coast Air Quality Management District

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FAXED: OCTOBER 4, 2006

October 4, 2006

Mr. Charles Fahie
City of Fontana
Planning Division
8353 Sierra Avenue,
Fontana, CA 92335

Dear Mr. Fahie:

**Draft Environmental Impact Report (DEIR) for
The Jurupa Business Park
(August 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. Thanks for giving the SCAQMD extra time to submit these comments.

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 available 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

SBC060809-05
Control Number

**Draft Environmental Impact Report (DEIR) for
The Jurupa Business Park**

Vehicle Idling: Mitigation Measure MM AQ 2 would prohibit all vehicles from idling in excess of ten minutes, both on-site and off-site. Please modify this measure to indicate that vehicles will not be allowed to idle longer than five minutes to be consistent with state law.

Localized Significance Thresholds: Although the lead agency prepared a localized significance threshold (LST) analysis for construction, a similar analysis was not completed for operational emissions from the proposed project. A LST analysis should be completed for operational emissions from the proposed project because of the number of haul trucks that will be visiting the distribution / manufacturing facilities at the site. The results of the operational LST analysis should be included in the Final EIR.

Reducing Project Emissions: Since construction nitrogen oxides (NO_x), carbon monoxide (CO) and volatile organic compounds (VOC) emissions are estimated to exceed the daily significance thresholds, and operational NO_x emissions are also expected to exceed the significance threshold even after the implementation of the recommended mitigation measures listed on pages 5.1-16 and 5.1-17 of the DEIR, SCAQMD staff recommends that the lead agency consider the following additional mitigation measures where feasible:

Construction Emissions Mitigation Measures:

- For construction equipment, as well as trucks that would be supplying materials and produce to the project site, 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, and oxidation catalysts.
- Use electricity from power poles instead of from temporary diesel- or gasoline-powered generators.
- Trucks hauling dirt, sand, gravel, soil or construction debris are to be covered.
- Enforce truck parking restrictions.
- Require installation of electrical sources for service equipment or docking of trucks to eliminate idling of main or auxiliary engines during loading and unloading, and when trucks are not in use.
- Use light-colored roofing materials to deflect heat and conserve energy.
- Install solar panels on roofs to supply electricity for air-conditioning.
- Install high energy-efficient appliances such as water heaters, refrigerators, furnaces and boiler units.
- Install automatic lighting on/off controls and energy-efficient lighting.
- To reduce volatile organic compounds (VOC) emissions, restrict the number of gallons of architectural coatings used per day. Where feasible, paint

contractors should use hand applications instead of spray guns. The lead agency should also encourage water-based coatings or coatings with a lower VOC content than 100 grams per liter. Alternatively, consider using materials that do not need to be painted or are painted prior to transporting to the site.

- Arrange for mobile food caterers to come to the project site during lunch break.
- Provide temporary traffic controls (e.g., flag person) during construction to ensure smooth traffic flows. Reroute construction trucks away from congested streets. Appoint a construction relations officer to act as a community liaison concerning on-site construction activity and all emissions related matters. Post a publicly visible sign with name of contact person and telephone number for dust complaints.

Operational Emissions Mitigation Measures:

- Require warehouse management to train employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks within the facility.
- Provide information of truck routes that avoid residential areas or schools.
- Provide food options, fueling, truck repair and or convenience store on-site or within the warehouse complex to minimize the need for trucks to traverse through residential areas for these services.
- Pave roads and parking areas.

Other mitigation measures for consideration by the lead agency can be found in Chapter 11 of the SCAQMD's 1993 CEQA Air Quality Handbook. See also mitigation measures listed at the following URL:

www.aqmd.gov/ceqa/handbook/mitigation/mm_intro.html.