



South Coast Air Quality Management District

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E-Mailed: August 16, 2013
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Ms. Rebecca Deming, Planning Director
550 East 6th Street
Beaumont, CA 92223

Review of the Draft Environmental Impact Report (Draft EIR) for the Proposed Beaumont Distribution Center Project

The South Coast Air Quality Management District (SCAQMD) staff 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 Environmental Impact Report (Final EIR) as appropriate.

The SCAQMD staff is concerned about the project's significant regional operational air quality impacts from the new industrial land use identified in the proposed project. Therefore, the SCAQMD staff recommends that the lead agency revise the Draft EIR to incorporate additional mitigation measures that minimize the project's significant air quality impacts pursuant to Section 15126.4 of the California Environmental Quality Act (CEQA) Guidelines. Further, SCAQMD staff recommends that the lead agency clarify the use of truck refrigeration units (TRUs) for the proposed project and further substantiate the methodology used to quantify the project's operational emissions. Details regarding these comments are attached to this letter.

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

Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,

A handwritten signature in black ink that reads "Ian V. MacMillan". The signature is written in a cursive style with a large initial "I".

Ian MacMillan

Program Supervisor, CEQA Inter-Governmental Review
Planning, Rule Development & Area Sources

Attachment

IM:DG

RVC130709-08

Control Number

Mitigation Measures for Operational Air Quality Impacts (Mobile Sources)

1. The lead agency's operational air quality analysis demonstrates significant regional air quality impacts from NO_x emissions. These impacts are primarily from mobile source emissions related to vehicle trips associated with the proposed project. However, the lead agency does not adequately address this large source of emissions and only requires a list of nominal non-quantifiable mobile source mitigation measures. Therefore, the lead agency should reduce the project's significant air quality impacts by reviewing and incorporating additional transportation mitigation measures, such as those listed below.
 - a) Require the use of 2010 and newer diesel haul trucks (e.g., goods/materials delivery trucks) and if the lead agency determines that 2010 model year or newer diesel trucks cannot be obtained the lead agency should consider methods to phase-in trucks with lower NO_x emissions as quickly as feasible. This could include incentives or other methods to encourage lower emissions.
 - b) Have truck routes clearly marked with trailblazer signs, so that trucks will not enter residential areas.
 - c) Improve traffic flow by signal synchronization.
 - d) Provide food options, fueling, truck repair and or convenience stores on-site to minimize the need for trucks to traverse through residential neighborhoods.
 - e) Provide electric vehicle (EV) Charging Stations (see the discussion below regarding EV charging stations).

Electric Vehicle (EV) Charging Stations

Trucks that can operate at least partially on electricity have the ability to substantially reduce the significant NO_x 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 project 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 stations¹. At a minimum, the electrical panels should be sufficiently sized to allow future upgrades and wiring should be provided to docks.

¹ http://ladbs.org/LADBSWeb/LADBS_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf

Mitigation Measures for Operational Air Quality and Greenhouse Gas Impacts (Non-Mobile Sources)

2. In addition to the mobile source mitigation measures identified above the lead agency should incorporate the following onsite area source mitigation measures below to reduce the project's overall significant regional air quality impacts and GHG impacts during operation. These mitigation measure should be incorporated pursuant to CEQA Guidelines §15126.4
 - a) Maximize use of solar energy including solar panels; installing the maximum possible number of solar energy arrays on the building roofs and/or on the Project site to generate solar energy for the facility. At a minimum, the applicant should commit to applying to the local electrical utility to install a large solar array on the roof that can feed power back into the grid.
 - b) Require all lighting fixtures (not only street lighting), including signage, to be the most energy efficient available, and require that new traffic signals have light-emitting diode (LED) bulbs and require that light fixtures be energy efficient compact fluorescent and/or LED light bulbs. Where feasible use solar powered lighting.
 - c) Maximize the planting of trees in landscaping and parking lots.
 - d) Use light colored paving and roofing materials.
 - e) Use passive heating, natural cooling, solar hot water systems, and reduced pavement.
 - f) Utilize only Energy Star heating, cooling, and lighting devices, and appliances.
 - g) Install light colored "cool" roofs and cool pavements.
 - h) Limit the use of outdoor lighting to only that needed for safety and security purposes.
 - i) Require use of electric lawn mowers and leaf blowers.
 - j) Require use of electric or alternatively fueled sweepers with HEPA filters.
 - k) Use of water-based or low VOC cleaning products.

Preclusion of Refrigerated Warehouse Space

3. Based on a review of the project's emissions calculations (see Appendix B: Air Quality, CalEEMod Output Sheets) it appears that the lead agency determined the project's air quality impacts using emission factors for unrefrigerated warehouses/truck activity. However, in mitigation measure MM-Air-4 the lead agency refers to the use of TRUs, therefore, the SCAQMD staff recommends that the lead agency include a mitigation measure that precludes the use of refrigerated warehousing at the project site or revise the air quality analysis to account for emissions from refrigerated warehouse uses. Further, if the lead agency chooses to include refrigerated warehouses in the air quality analysis then MM-Air-4 should remain in place for the Final EIR.

Project Trip Rate (Air Quality Analysis)

4. The proposed project will primarily support goods movement in the region; as a result, the lead agency chose a vehicular trip generation rate for the proposed project of 1.771 trips per 1,000 ft² of building space (1.131 for passenger cars and 0.640 for trucks). However, the lead agency presented a limited discussion related to its derivation and use of the overall project trip rate. Therefore, the SCAQMD staff recommends that the lead agency provide additional information to substantiate the methodology used to derive the proposed project trip rate. Specifically, the lead agency should include a discussion regarding the default CalEEMod trip rate for high cube warehouses/unrefrigerated warehouse-no rail (i.e., 2.59 trips per 1,000 ft²) and the factors that resulted in the project's reduced trip rate mentioned above.