South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

E-MAILED: FEBRUARY 1, 2013 February 1, 2013

Mr. Mark Tomich, Director, MTomich@ci.colton.ca.us
Development Services, Planning Division
City of Colton
659 N. La Cadena Drive
Colton, CA 92324

**Draft Mitigated Negative Declaration (Draft MND)
for the Proposed Colton – DEXUS Project**

The South Coast Air Quality Management District (AQMD) 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 CEQA document. In the project description, the lead agency proposes demolition of the existing 28,000 square foot truck terminal and 18,000 square foot office building. Building construction would include a high-cube warehouse building on the 34.36 acre site. The proposed facility would have 600,046 square feet of building area (12,000 square feet of office area and 588,048 square feet of warehouse/distribution space). The proposed project would include 116 dock doors with parking for 425 standard and handicap spaces, and 42 trailer spaces. Construction is expected to last approximately 10 months and 2014 is the proposed opening year. Although basically zoned for industrial uses, there is a single-family residence located less than a quarter mile northwest of the project site along Agua Mansa Road.

The AQMD staff requests that the lead agency provide additional information regarding the fate of the existing facility. The CEQA analysis assumes it will cease its operations within the boundaries of the South Coast Air Basin (SCAB) by applying the emissions from the current operation to the baseline thus offsetting the projected emissions from the proposed high-cube warehouse use. In addition, the baseline itself may be overestimated by using generalized trip generation estimates instead of the on-site traffic count data to account for vehicle activity and the resulting air quality impacts for the existing operation. Because the determination of significance under CEQA is based on the difference between existing baseline and future project impacts, we recommend that the lead agency provide further substantial evidence for, and re-evaluate where necessary, the baseline and future impacts of this project. If impacts are found to be significant, then additional mitigation may be required to reduce these impacts to a less than significant level. Details regarding these comments and others follow in the attachment.

Please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. The AQMD staff is available to work with the Lead Agency to address these issues and any other air quality questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

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

IM:GM
Attachment

LAC130115-02
Control Number

Baseline Emissions and the Status of the Existing Use

1. In a telephone conversation staff on or about January 15, 2013, the lead agency staff expressed uncertainty to AQMD staff whether the existing truck terminal business would cease operations completely within the SCAB boundaries or continue its current operations at the site but at a lower level of activity. The lead agency's operational air quality analysis uses the emissions from the existing use as a baseline to offset the estimated long-term air quality impacts from the proposed warehouse use. It is unclear to AQMD staff if the incremental emissions benefit derived from the existing use would actually be realized. Unless there is assurance that the previous facility activities will cease and not move to another location within the SCAB, the lead agency should not include these emissions as a baseline when calculating regional impacts. AQMD staff requests that the lead agency provide additional discussion of the fate of the existing operations and revise the air quality and greenhouse gas analyses, if necessary.

Potential Overestimation of the Existing Facility Baseline Emissions

2. The lead agency has estimated project emissions for the existing truck terminal building activity using the California Emissions Estimator Model (CalEEMod) and using trip rates based on land uses shown in the Institute of Traffic Engineers (ITE) Trip Generation, 8th Edition (2008) and the Truck Trip Generation Study (City of Fontana, August 2003). In addition to these sources, the lead agency included traffic count worksheets in the Revised Traffic Impact Analysis (Kunzman Associates, Inc., October 2012). It is not clear to the AQMD staff why available project-specific traffic count data included in the Draft MND that could be used to analyze vehicle activity and associated emissions for the existing facility were not used to estimate baseline emissions.

   The AQMD staff believes that using the ITE trip rate to calculate baseline vehicle activity may substantially overestimate project vehicle activity and related on-road mobile source emissions compared with the data supplied in the traffic analysis. This is demonstrated, for example, by looking at the volumes supplied in the Traffic Impact Analysis (TIA) for vehicles entering the facility during the AM peak hour shown on page 11 (Figure 5, Existing Morning Peak Hour Intersection Turning Movement Volumes). For Intersection Six (the main entrance into the facility) in Figure 5, the number of vehicles entering and exiting the facility totals 70. From Table 3 of the TIA (Current Development {Truck Maintenance Facility}), the lead agency has estimated, using the ITE trip rate for the General Light Industrial (110) land use, 259 vehicles per hour. This is more than three times the 70 vehicles per hour found from actual traffic counts. Using the ITE trip rate instead of the vehicle data shown from the traffic counts appears to significantly overestimate the existing project baseline emissions. This results in the incremental emissions, i.e., the difference between the existing facility emissions and the emissions for the proposed warehouse facility being

underestimated. The AQMD staff therefore recommends that applicable analyses be revised in the Final MND using the project-specific traffic count data. Alternatively, the lead agency could explain why the project-specific traffic counts should be ignored.

On-Road Truck Trip Length

3. In the CalEEMod input files provided to AQMD staff by the lead agency, an average one-way trip length of 8.3 miles was used to estimate operational air quality impacts for trucks moving goods for the proposed facility. Trucks operating from these kinds of facilities often handle goods coming directly from the port areas over 70 miles away as well as potentially serving out of state destinations. Absent tenant-specific trip length information, the AQMD staff recommends a one-way trip length from the project site to the port areas as more appropriate trip length for on-road truck emissions and that applicable analyses in the Final MND be revised. If the lead agency is uncertain of the types of tenants or the trip lengths, the lead agency could alternatively limit activities, as a condition of a tenant's occupancy, to levels described in the analysis. Otherwise, long-term project air quality impacts for operations and other relative analyses will be substantially underestimated.

Use of Non-Default Truck Trip Rate

4. In the air quality and health effect analyses, the lead agency based its estimates on trip generation rates from the 8th Edition of the Institute of Transportation Engineers (ITE) Report using a non-default trip rate of 1.44 per thousand square of gross floor area (Land Use Code 152 – High-Cube Warehouse). Based on guidance from the California CalEEMod User's Guide, the AQMD staff recommends using a more conservative trip rate of 2.59 per 1,000 square feet. AQMD staff believes a more conservative trip rate is appropriate as the tenant is unknown, and there are no conditions on the project limiting activity to what is analyzed in the MND.

CalEEMod Fleet Mixture Percentage

5. On page 28 of the Draft IS/MND, the lead agency's narration lists the fleet mixture percentages used in the CalEEMod land use model to estimate operational emissions. The narration states that the estimated fleet mixture is approximately 37 percent truck traffic for the proposed warehouse use including 17 percent heavy-heavy duty (HHD); 8 percent medium-heavy duty (MND); and 12 percent light-heavy duty 1 (LHD1). The CalEEMod inputs, however, also include the 3.4 percent Light-Heavy Duty 2 (LHD2) category that was omitted in the narration total. The 3.4 percent LHD2 percentage would therefore increase the overall truck percentage from 37 to 40 percent. In the Final MND, the narration should be revised to be consistent with the CalEEMod fleet percentages shown in the actual modeling.

Localized Significance Thresholds Analysis: Construction and Operations

6. Under Sensitive receptors on page 13 of the Air Quality & Climate Change Assessment and upon an aerial map inspection, a single-family residential property appears to be located within one-quarter mile of the proposed warehouse. We therefore recommend that the lead agency evaluate localized air quality impacts. The AQMD staff requests this evaluation to ensure that any nearby sensitive receptors are not adversely affected by the construction and operational activities that are occurring in close proximity. AQMD guidance for performing a localized air quality analysis can be found at the following web address: http://www.aqmd.gov/ceqa/handbook/LST/LST.html .

Operational Mitigation Measures

7. In the event the lead agency determines that project air quality impacts (regional or localized) for operations will exceed recommended significance thresholds (mostly attributed to mobile source tailpipe emissions from vehicles operating at the proposed facility), the AQMD staff encourages the lead agency to develop a common set of enforceable mitigation measures to reduce those emissions to the maximum extent feasible. As the lead agency is aware, heavy-duty trucks are the largest source of NOx emissions in our basin and NOx emissions must be reduced by approximately two thirds beyond existing rules and regulations in order to meet air quality standards as required by 2023. Without meeting air quality standards, our region faces federally mandated sanctions, including possible loss of transportation funding. AQMD staff therefore recommends that the lead agency consider the feasibility of the following measures to reduce project impacts. Other lead agencies that have imposed these and similar measures include the City of Banning[1], Riverside County[2], City of San Bernardino[3], and the San Pedro Bay Ports[4], among others.

   Recommended additional measures:

   - Lease/purchase documents shall identify that tenants required to implement the following:
   - At project start, all heavy duty trucks entering the property must meet or exceed 2010 engine emission standards specified in California Code of Regulations Title 13, Article 4.5, Chapter 1, Section 2025.
   - If the above clean truck requirements are infeasible, a phase-in schedule should be put forth that will feasibly achieve emission reductions as soon as possible, and faster than existing regulations. Should an alternative

[1] Banning Business Park http://banning.ca.us/archives/30/July%2013,%202010%20City%20Council%20Agenda.pdf .
[2] Mira Loma Commerce Center: http://www.rctlma.org/online/content/conditions_of_approval.aspx?PERMITNO=pp17788 .
[3] Palm/Industrial Distribution Center http://www.ci.san-bernardino.ca.us/civica/filebank/blobdload.asp?BlobID=11793
[4] Clean Trucks Program http://www.cleanairactionplan.org/cleantrucks/ .

schedule be found necessary, the AQMD staff should be consulted prior to approving the schedule.

- Provide a phase-in schedule and goals for the introduction of zero or near-zero technology trucks (e.g., 10% by 2020, 20% by 2025, etc.) that visit warehouses.

The facility operator will maintain a log of all trucks entering the facility to ensure that on average, the daily truck fleet meets the quantities and emission standards listed in the Draft MND. This log should be available for inspection by city staff at any time.

- The facility operator will ensure that onsite staff in charge of keeping the daily log and monitoring for excess idling will be trained/certified in diesel health effects and technologies [for example, by requiring attendance at CARB approved courses (such as the free, one-day Course #512)].

- Limit the daily number of trucks allowed at each facility to levels analyzed in the Final MND. If higher daily truck volumes are anticipated to visit the site, the lead agency should commit to re-evaluating the project through CEQA prior to allowing this higher activity level.

- Require at least a portion of the fleet to utilize alternative fueled technologies.

- The 2012 Regional Transportation Plan includes a zero-near-zero emissions truck corridor along the SR-60 freeway west of I-15. Because at least a portion of the trucks serving this project may be expected to travel along this route, the project should consider providing onsite alternative fueling infrastructure, such as electric charging stations or natural gas fueling that will help facilitate these low-emitting trucks. This could include ensuring electrical panels and wiring are sufficiently sized to accommodate future needs.

- At a minimum, require tenants upon occupancy that do not already operate 2007 and newer trucks to apply in good faith for funding to replace/retrofit their trucks, such as Carl Moyer, VIP, Prop 1B, or other similar funds. Should funds be awarded, the tenant should also be required to accept and use them.

- Restrict overnight parking in residential areas. Establish overnight parking within the warehouse/distribution center where trucks can rest overnight.

- Establish area(s) within the facility for repair needs.

- Post signs outside of the facility providing a phone number where neighbors can call if there is a specific issue.

- Develop, adopt and enforce truck routes both in and out of city, and in and out of facilities.

- Have truck routes clearly marked with trailblazer signs, so trucks will not enter residential areas.
- Identify or develop secure locations outside of residential neighborhoods where truckers that live in the community can park their truck, such as a Park & Ride.
- Provide food options, fueling, truck repair and or convenience store on-site to minimize the need for trucks to traverse through residential neighborhoods.
- Requiring all on-site vehicles (hostlers, forklifts, etc.) to utilize zero or near-zero emission technology.
- Use street sweepers that comply with SCAQMD Rules 1186 and 1186.1.
- Install solar panels on all available roof space. If this isn't feasible, then at a minimum all buildings and electrical infrastructure should be designed to accommodate potential future solar panel upgrades.

Off-Road Construction Equipment Reduced Load Factors

8. In Appendix B (CalEEMod Output) in the air quality assessment, the lead agency estimated project construction impacts using the CalEEMod land use emissions computer model. This model uses default and user-defined settings to estimate emissions based on the land use settings. In the CalEEMod inputs under User Entered Comments, the lead agency has reduced the Construction Phase Off-Road Equipment load factors by 33 percent citing the California Air Resources Board (CARB) as authority for the changes. For example, the default load factor in the CalEEMod model for rubber tired loaders of 54 percent was reduced to 36 percent.

   Based on communication with ARB staff[5] regarding this issue, the AQMD staff confirmed that CARB staff does not recommend reducing the default settings in the current OFFROAD2007 without considering all parameters besides the load factor. Other parameters such as activity level, horsepower, and population all contribute to the emission factor estimate, and selectively changing only one parameter will lead to inaccurate estimates at a project level. For some equipment types, OFFROAD2007 may underestimate emissions while others may be overestimated. Because of these revisions (and others), CARB developed the new OFFROAD2011. The AQMD staff therefore recommends that the lead agency either use existing OFFROAD2007 defaults until OFFROAD2011 is incorporated into CalEEMod later this year or run OFFROAD2011 outside CalEEMod and use those results to modify the CalEEMod construction calculations. Therefore, even though the reductions might not change the lead agency's determination of significance for construction air quality impacts, these reductions related to

[5] Personal communication with Nicole Dolney, June 1, 2012.

reduced off-road equipment load factors are not recommended by the AQMD staff without further substantial evidence to support those emission reductions resulting from their use. Otherwise, the lead agency should commit to enforcing the assumed lower non-substantiated emission factors.

Construction Mitigation Measures

9. Should the lead agency determine that project localized construction air quality impacts will exceed the AQMD recommended daily significance thresholds, the AQMD staff therefore recommends the following mitigation measures during the projected 10 month construction period to reduce adverse air quality impacts from on-site construction emission sources, if applicable and feasible.

   Recommended additions:

   - Limit the amounts of daily soil disturbance to the amounts analyzed in the Draft MND.
   - All clearing, grading, earth-moving, or excavation activities shall cease when winds (as instantaneous gusts) exceed 25 miles per hour per SCAQMD guidelines in order to limit fugitive dust emissions.
   - Apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more).
   - All trucks hauling dirt, sand, soil, or other loose materials are to be covered.
   - Sweep streets at the end of the day if visible soil is carried onto adjacent public paved roads (recommend water sweepers with reclaimed water).

   Further, other lead agencies in the region including LA County Metro, the Port of Los Angeles, and the Port of Long Beach have also enacted the following mitigation measures. AQMD staff recommends the following measures to further reduce air quality impacts from construction equipment exhaust:

   - Project start to December 31, 2014: All off-road diesel-powered construction equipment greater than 50 hp shall meet Tier 3 off-road emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
   - Post-January 1, 2015: All off-road diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by

the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

- A copy of each unit's certified tier specification, BACT documentation, and CARB or AQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.

For additional measures to reduce off-road construction equipment, refer to the mitigation measure tables located at the following website: www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html .