



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA USPS AND E-MAIL:
msuarez@ci.colton.ca.us

October 3, 2014

Mr. Mario Suarez, AICP, CNU-A, Senior Planner
Development Services Department
City of Colton
659 North Cadena Drive
Colton, CA 92324

Draft Mitigated Negative Declaration (Draft MND) for the Proposed Auto Plaza at Fairway Warehouse Project

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 into the Final Mitigated Negative Declaration.

The Lead Agency proposes construction of an approximately 178,980 square foot industrial warehouse project on a vacant 8.34 acre lot. This warehouse will have up to 203 parking spaces and 23 loading docks. Daily vehicle activity will include approximately 638 total vehicle trips including 131 truck trips. Construction is scheduled to begin in early 2015 with operations beginning mid-year.

The SCAQMD has concerns about potential adverse health effect impacts that should be estimated from trucks that could travel west on an approved truck route from the project site to access the Interstate 10 (I-10) Freeway. Although the truck trip distribution shows that trucks do not currently travel west from the project site, project trucks are not precluded from doing so meaning that they could travel by local residences along Fairway Drive and other streets to access the I-10 Freeway. In addition, there is a concern about the consistency of the fleet mixture percentage used in the CalEEMod input files compared to the fleet mixture percentages cited in the Traffic Impact Analysis. Further, the mitigation taken to reduce on-road mobile source operational emissions needs further documentation to support the reduction taken in the Draft MND. Finally, the SCAQMD staff recommends that additional feasible mitigation be incorporated to minimize or reduce operational emissions to less than significant levels if further analyses indicate that there are still significant project impacts. Additional details are included in the attachment.

Mr. Mario Suarez, AICP, CNU-A
Senior Planner

1

October 3, 2014

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final MND. The SCAQMD 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,

Jillian Baker

Jillian Baker, Ph.D.
Program Supervisor
Planning, Rule Development & Area Sources

Attachment

JB:GM

SBC140926-01
Control Number

Evaluating Health Risks for Trucks Using Fairway Drive

1. The SCAQMD has concerns about potentially adverse health effect impacts from trucks traveling past sensitive receptors (family residences) located along Fairway Drive should project trucks access the Interstate 10 Freeway(I-10 Freeway) by Fairway Drive and Mount Vernon Avenue (N. Sperry Drive, E. H Street, E. Valley Boulevard, etc.). Although the Draft MND shows truck traffic using Fairway Drive and Auto Center Road to access the Interstate 215 Freeway,¹ the Mobility Element in the General Plan includes Fairway Drive as an approved truck route. Because trucks are not precluded from using Fairway Drive to access the I-10 Freeway in the Draft MND or by the City's Mobility Element, the SCAQMD staff believes that project trucks can use this approved truck route. If this is the case, the Lead Agency has therefore not demonstrated that the potential health risk to sensitive receptors along these potential routes is less than significant. The Lead Agency should therefore analyze these impacts using a worst-case basis to determine these health effect impacts in the Final MND.

Operations Air Quality Analysis

Fleet Mixture Percentages Assumed in the CalEEMod Land Use Modeling

2. In the Air Quality and Greenhouse Gas Analyses, the fleet mixture percentages used to estimate operational emissions in the California Emissions Estimator Model (CalEEMod) were based on the Fontana Truck Trip Generation Study (2003).² In the CalEEMod output sheets for fleet mixture, the input for LHD2 is 0.00; MHD 0.00; and HHD is 0.123 rather than the stated Fontana Study fleet mixture percentages: LHD2 - 0.0346 and MHD - 0.0464. The 0.123 percentage input for HHD is consistent with the percentage stated in the traffic report footnote. The air quality analysis should be revised in the Final MND consistent with the fleet mixture assumptions in the traffic and air quality reports. Otherwise, operational emission impacts from on-road trucks will be underestimated.

CalEEMod Output Sheets - Mitigated Operational Emission Impacts

3. In Table B: Long-Term Project Operational Emissions, the Lead Agency estimates 58 pounds per day of unmitigated NOx emissions, mostly from on-road mobile sources, and 54 pounds per day of mitigated NOx emissions. Upon review of the modeling output sheets, both unmitigated and mitigated estimates show 57 pounds per day of NOx. Further, there are no user defined comments in the modeling or changes to the modeling inputs documenting the control efficiency reduction used in Table B. Page 3-8 in the Draft MND states, however, that compliance with the EPA's Smartway Program will reduce operational NOx on-road emissions from 58 to 54 pounds per day but does not provide the methodology, control efficiency, equations, etc. to support the reduction. Therefore, the Final MND should include the substantial

¹ Traffic Impacts Analysis, Figure 7 – Truck Trip Distribution

² Ibid., Table D – Project Trip Generation, Footnote 1

evidence to support the NO_x emission reduction shown in Table B. Otherwise, regional operational NO_x emissions would remain a significant impact requiring additional mitigation according to CEQA Guidelines §15369.5.

Mitigation Measures for Operational Air Quality Impacts (Mobile Sources)

4. On page 3-8 of the Draft MND, Mitigation Measure AQ-1 should be revised to include more detail to show how this measure will be implemented and enforced by the Lead Agency in the Final MND.
5. Should the Lead Agency determine after further analysis that project operational emission impacts will exceed the SCAQMD recommended significance thresholds for NO_x, PM_{2.5} and other emissions from on-road truck emissions, additional mitigation should be incorporated to reduce potential significant impacts. The SCAQMD staff therefore recommends the following additional measures be incorporated into the project and Final MND:

The Lead Agency

- Limit activities to the amounts analyzed in the Draft CEQA document.
- Require the use of 2010 compliant diesel trucks, or alternatively fueled, delivery trucks (e.g., food, retail and vendor supply delivery trucks) at commercial/retail sites upon project build-out. If this isn't feasible, consider other measures such as incentives, phase-in schedules for clean trucks, etc.
- Have truck routes clearly marked with trailblazer signs, so that trucks will not enter residential areas.
- Re-Route truck traffic by restricting truck traffic on certain routes that pass by sensitive receptors, e.g., residences, schools, etc. Project trucks should be prohibited from using Fairway Drive and other routes associated with accessing the I-10 Freeway unless a health risk assessment is conducted to determine potential health effect impacts.
- Prohibit all vehicles from idling in excess of five minutes, both on- and off-site.
- Improve traffic flow by signal synchronization.

Alternative Fueled Truck Phase-In Schedule

6. Should the proposed project generate significant regional emissions, the Lead Agency should require mitigation that requires accelerated phase-in for non-diesel powered trucks. For example, natural gas trucks, including Class 8 HHD trucks, are commercially available today. Natural gas trucks can provide a substantial reduction in health risks, and may be more financially feasible today due to reduced fuel costs compared to diesel. In the Final CEQA document, the Lead Agency should require a phase-in schedule for these cleaner operating trucks to reduce project impacts.

SCAQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency and project applicant.

Electric Vehicle (EV) Charging Stations

7. Trucks that can operate at least partially on electricity have the ability to substantially reduce the significant NOx 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 since 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 proposed warehouse and other plan areas that allow truck parking 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 stations³. Further, electrical hookups should be provided at the onsite truck stop for truckers to plug in any onboard auxiliary equipment. At a minimum, electrical panels should appropriately sized to allow for future expanded use.

Mitigation Measures for Operational Air Quality Impacts (Other Area Sources)

8. 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 regional air quality impacts from NOx emissions during operation, if further revisions to the air quality impact analysis prove that operational NOx impacts are significant. These mitigation measure should be incorporated pursuant to CEQA Guidelines §15126.4, §15369.5.
 - 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.
 - Maximize the planting of trees in landscaping and parking lots.
 - Use light colored paving and roofing materials.
 - Utilize only Energy Star heating, cooling, and lighting devices, and appliances.
 - Install light colored "cool" roofs and cool pavements.
 - Limit the use of outdoor lighting to only that needed for safety and security purposes.

³ http://ladbs.org/LADBSWeb/LADBS_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf

- Require use of electric or alternatively fueled sweepers with HEPA filters.
- Use of water-based or low VOC cleaning products.