



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

FAXED: AUGUST 4, 2005

August 4, 2005

Ms. Valerie C. Ross, Deputy Director/City Planner
City of San Bernardino/Development Services Department
300 N. "D" Street
San Bernardino, CA 92404

**Draft Subsequent Environmental Impact Report for the Proposed Stater Bros.
Distribution Center Project**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The SCAQMD also appreciates the additional time granted by the lead agency to review the Draft Subsequent EIR for the proposed project and provide comments. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final Environmental Impact Report.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final Environmental Impact Report. The SCAQMD staff would be happy to work with the Lead Agency to address these issues and any other 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,

Steve Smith, Ph.D.
Program Supervisor, CEQA Section
Planning, Rule Development & Area Sources

Attachment

SS:GM

SBC050621-03
Control Number

**Draft Subsequent Environmental Impact Report for the Proposed Stater Bros.
Distribution Center Project**

Air Quality Analysis

Short-Term Emission Estimates

1. The discussion of construction air quality impacts on page 20 of Appendix B recognizes that construction occurs in three main phases: demolition, site preparation (grading), and construction of structures. However, in (Table 5.3-6 (Construction Activities and Equipment Emissions) in Volume 1 and Table F: Peak Construction Day – Total Emissions in Volume 2 in the Air Quality Analysis (AQ Analysis)), the lead agency shows construction emission estimates from the site grading phase of construction only. In the Final SEIR, as explained in more detail in the following comments, the Draft Subsequent EIR (Draft SEIR) contains an incomplete analysis of demolition and construction phase air quality impacts.

Demolition Phase

- a) In the Fugitive Dust Emission Worksheet in the AQ Analysis in Appendix B, the lead agency has included a daily estimate for PM10 fugitive dust from building demolition activities but the Draft SEIR does not include combustion emission estimates from construction equipment, similar to the information detailed in Tables E and Table F for site grading. Without this information, it is unclear how the lead agency can conclude that the site preparation phase of construction produces peak daily construction emissions that do not exceed the SCAQMD daily significance thresholds. The Final SEIR should include all demolition emission sources and related air quality emission estimates e.g., the number and activity levels of all off- and on-road equipment used to demolish, load and haul away demolition debris, etc., other vehicle sources, worker trips from demolition, etc.
- b) On page 4-8 of the Draft SEIR, it is stated that buildings in the former base are being demolished not only because they are in poor condition, but because they also contain “unacceptable levels of contaminants (such as asbestos).” However, potential health risks of demolishing lead and asbestos containing materials are not addressed in the Draft SEIR. This potential adverse impact needs to be evaluated and mitigation measures imposed, if necessary, to protect public health to nearby residents and workers.

**Draft Subsequent Environmental Impact Report for the Proposed Stater Bros.
Distribution Center Project**

Short-Term Emission Estimates, cont.

Site Preparation Phase

- c) During site preparation, Table E and Table F in the AQ Analysis do not include the on-road vehicle emission estimates for hauling infill described in Volume 1 on page 4-4, 300 truck trips per day (Fugitive Dust Emissions Worksheet, Appendix B) traveling five miles, one way to obtain fill material. These estimates, supporting equations, emission factors and methodologies should be included in the Final SEIR and Tables E and F should be then be revised. The additional combustion impacts when added to the site preparation estimates in Tables E and F would likely further increase vehicle emissions to further exceed the total daily significance threshold for NO_x during the site preparation phase.
- d) On page 20 of Appendix B, the lead agency qualitatively dismisses construction phase impacts by stating that the intensity of heavy-duty equipment usage will be much less than during the site grading phase and that even though there is an eight-fold increase in the number of construction workers per day (400 workers per day), emissions will not be significant. The problem with these statements is that the lead agency does not account for the increase in the number of pieces of construction equipment used by 400 workers per day. Further, some types of construction equipment used during the building construction phase, e.g., cranes, have very high emission rates. Therefore, the SCAQMD recommends that the lead agency calculate building construction emissions, by identifying all construction equipment, both on- and off-site, vehicle miles traveled or hours of operation, respectively, assumptions, emission factors used., etc.

Building Construction Phase

- e) On page 5-63 of the Draft SEIR, the lead agency calculates VOC emissions from architectural coatings. Although the lead agency uses the appropriate Rule 1113 emission factor from Table A9-13-B (2.08 pounds per gallon), the area coated appears to be underestimated. According to Table A9-13-C, to obtain the area to be coated for non-residential projects, the floor area is multiplied by 2.0. It is recommended that the lead agency revise the architectural coating emission estimate using this methodology or document the methodology used to obtain the coated area of 129,000 square feet. Also, the lead agency needs to indicate if other emissions are occurring during the architectural coating phase, e.g., worker commute trips, internal combustion engines, etc.

**Draft Subsequent Environmental Impact Report for the Proposed Stater Bros.
Distribution Center Project**

Short-Term Emission Estimates, cont.

Building Construction Phase, cont.

- f) The analysis does not include air quality impact estimates for asphalt paving emissions in the building construction phase. These emissions should be included in the Final SEIR including the combustion emissions from on- and off-road equipment, worker trips and asphalt paving.

Long-Term Emission Estimates

2. In Volume 1 Table G: Project Operational Emissions, the lead agency has estimated project operational emissions for the proposed project by inputting land and other inputs into the URBEMIS computer model and project trip generated detailed in Table 5.2-11. Based on the numbers of trips described in Table 5.2-11, SCAQMD then estimated the operational air quality impacts using basic assumptions and EMFAC 2002 emission factors and found that there was a large discrepancy between the emission estimates in Table G and the estimates resulting from using only the EMFAC 2002 formula. In addition, the Draft SEIR did not include mileage figures for the vehicle trips described in Tables 5.2-11. When operational air quality impacts were estimated by SCAQMD, the operational impacts in Table G seemed substantially underestimated. Therefore, the SCAQMD recommends that the lead agency revise the estimates in Table G in the Final SEIR using the EMFAC 2002 emission factors and calculate operational emission impacts by hand rather than estimating long-term air quality impacts using the URBEMIS 2002 model to more accurately estimate operational impacts for the proposed project.

Health Risk Assessment (HRA)

3. The diesel exhaust HRA emission factors were developed using an average of 2010 to 2040 emission factors generated by EMFAC 2002. Operational emissions from the proposed project would begin in 2007. The Final SEIR should contain a discussion on the impacts of using emissions factors beginning in 2007 rather than 2010.

**Draft Subsequent Environmental Impact Report for the Proposed Stater Bros.
Distribution Center Project**

Health Risk Assessment (HRA), cont.

4. The source of the idle emission factors is not clearly referenced. The idle emission factor can be estimated by EMFAC2002 by including a vehicle speed of zero miles per hour. EMFAC2002 will provide the fleet average PM10 idling emission factor in grams per hour for diesel trucks. If the EMFAC2002 idling emission factors were used, this should be clearly stated in the Final SEIR/HRA. The EMFAC2002 output file included in Appendix B of the Air Quality Analysis in Appendix B of the SEIR does not list idling emission factors. If the idling emission factors were not developed by EMFAC2002, the Final SEIR/HRA should include idling emission factors developed using EMFAC2002.
5. The idle time was limited to 1.5 minutes per trip. This is below the State mandated five minute idling restriction. The State limits idling to five consecutive minutes at a location. Since the health risk is based on 1.5 minutes of idling per trip, the land use permit should include this condition to ensure compliance with this restriction.
6. The PM10 emissions in the HARP model for the Stater Bros. Headquarters (4.9 pounds per year) are lower than those presented in Table B of the HRA/SEIR (78 pounds per year). The PM10 emissions in the Final HRA/SEIR and those modeled in HARP should be consistent.
7. Dispersion modeling was completed with the EPA regulatory defaults. SCAQMD requires that dispersion modelers bypass the calm processing routine and not use the stack-tip downwash options. The HRA should contain dispersion modeling with no calm processing routine and no stack-tip downwash options.
8. Health risk value HRAs were developed for both the proposed facility and at a nearby intersection. The HRA states that the two values should not be combined because it would result in double counting. The development of the emissions for truck traffic at the intersection is not presented in the HRA/SEIR; therefore, it is unclear if the emissions would be double counted if the risk values were added together. The HRA/SEIR should detail how emissions at the intersection were developed.

The SCAQMD's Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions states that both on-site and off-site emissions should be included to evaluate risk. The HRA should be redone with both project specific emissions on-site and off-site modeled together.

**Draft Subsequent Environmental Impact Report for the Proposed Stater Bros.
Distribution Center Project**

Mitigation Measures

Mitigation Measures for Construction Air Quality Impacts

9. In order to reduce public exposure to particulate matter and other air contaminants from the project and to comply with the statewide regulation limiting diesel-fueled commercial motor vehicle idling (see California Air Resources Board website: <http://www.arb.ca.gov/toxics/idling/regtext.htm>), the SCAQMD staff recommends that the lead agency modify the following construction mitigation measure:

Recommended Change:

- 5.3-7 All diesel-powered vehicles both on-site and off-site shall be turned off when not in use for more than ~~ten (10)~~ five (5) minutes and gasoline-powered equipment shall be turned off when not in use for more than five minutes.

Mitigation Measures for Construction Air Quality Impacts, cont.

10. Because the lead agency has determined in Volume 1 on page 5-71 that the construction air quality impacts from the proposed project exceed established daily significance thresholds for nitrogen oxide (NO_x), the SCAQMD recommends the following mitigation measures to further reduce NO_x impacts from the project, if applicable and feasible:
- Configure construction parking to minimize traffic interference.
 - Reroute construction trucks away from congested streets or sensitive receptor areas.
 - Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site.
 - Use electricity from power poles rather than temporary diesel or gasoline generators.
 - Use street sweepers that comply with SCAQMD Rules 1186 and 1186.1.
 - Use construction equipment that are fueled by emulsified diesel fuels, ultra-low sulfur diesel, alternative clean fuels and that are equipped with particulate filters and oxidation catalysts.

**Draft Subsequent Environmental Impact Report for the Proposed Stater Bros.
Distribution Center Project**

Mitigation Measures, cont.

11. Because the construction air quality impacts from the proposed project are estimated to exceed established daily significance thresholds for particulate matter (PM10) from fugitive dust, the SCAQMD staff recommends that the lead agency consider modifying the following mitigation measure to further reduce construction air quality impacts from the project, if applicable and feasible:

Recommended Changes:

- 5.3-1 During grading activities, any exposed soil areas shall be watered ~~twice~~ three times per day. ...

Mitigation Measures for Operational Air Quality Impacts

12. In order to reduce public exposure to particulate matter and other air contaminants from the project and to comply with the statewide regulation limiting diesel-fueled commercial motor vehicle idling (see California Air Resources Board website: <http://www.arb.ca.gov/toxics/idling/regtext.htm>), the SCAQMD staff recommends that the lead agency modify the following operational mitigation measure in Volume 1 on page 5-73 of the Draft SEIR:

Recommended Change:

- 5.3-16 ~~Delivery trucks~~ All vehicles both on-site and off-site shall turn off their engines if the anticipated duration of idling exceeds 3 ~~when not in use for more than five (5) minutes.~~

13. Because the operational air quality impacts from the proposed project are estimated to exceed established daily significance thresholds for volatile organic compounds (VOC) and nitrogen oxide (NO_x), the SCAQMD recommends that the lead agency consider should consider adding the following mitigation measures to those listed in Volume 1 on page 5-73 to further reduce operational air quality impacts from the project, if applicable and feasible:

Recommended Additions:

- Re-route truck traffic by adding direct off-ramps for the truck or by restricting truck traffic on certain sensitive routes;
- Improve traffic flow by signal synchronization;

**Draft Subsequent Environmental Impact Report for the Proposed Stater Bros.
Distribution Center Project**

Mitigation Measures, cont.

Mitigation Measures for Operational Air Quality Impacts, cont.

- Use street sweepers that comply with SCAQMD Rules 1186 and 1186.1;
- Require or provide incentives to use low sulfur diesel fuel with particulate traps;
- Conduct air quality monitoring at sensitive receptors ;
- Alternative fueled off-road equipment;
- Create a buffer zone of at least 300 meters (roughly 1,000 feet), which can be office space, employee parking, greenbelt, etc. between the warehouse/distribution center and sensitive receptors;
- Design the warehouse/distribution center such that entrances and exits are such that trucks are not traversing past neighbors or other sensitive receptors;
- Design the warehouse/distribution center such that any check-in point for trucks is well inside the facility property to ensure that there are no trucks queuing outside of the facility;
- Require the warehouse/distribution center to clearly define the primary entrance and exit of the warehouse/distribution center;
- Restrict overnight parking in residential areas;
- Enforce truck parking restrictions;
- Establish overnight parking within the warehouse/distribution center where trucks can rest overnight;
- Establish area(s) within the facility for repair needs.
- Require all warehouse/distribution centers to operate the cleanest vehicles available;
- Conduct periodic community meetings inviting neighbors, community groups, and other organizations;
- Consider coordinating an outreach program to educate the public on, and their concerns relating to the potential for cumulative impacts from a new warehouse/distribution center;
- Post signs outside of the facility providing a phone number where neighbors can call if there is a specific issue;
- Provide food options, fueling, truck repair and or convenience store on-site to minimize the need for trucks to traverse through residential neighborhoods.