



# South Coast Air Quality Management District

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

**FAXED: MAY 20, 2005**

May 20, 2005

Ms. Paula Kelly  
City of Irwindale  
Department of Planning  
5050 North Irwindale Avenue  
Irwindale, CA 91706

Dear Ms. Kelly:

**Mitigated Negative Declaration for Site Plan and Design Review  
No. 1-05 SP & DR: (McMahon Development)**

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 Mitigated Negative Declaration.

Please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Mitigated Negative Declaration. The SCAQMD would be happy 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

LAC050504-08  
Control Number

**Mitigated Negative Declaration for Site Plan & Design Review  
No. 1-05 SP & DR (McMahon Development)**

1. **Screening Tables:** On page 10 of the Environmental Checklist, the lead agency concludes that the proposed project will not generate significant adverse air quality impacts because the project does not exceed the 500,000 sq. ft. threshold for industrial buildings in the screening tables in Chapter 6 of the 1993 SCAQMD CEQA Air Quality Handbook (Handbook). Please note that although the screening tables in the Handbook were developed by the SCAQMD, the SCAQMD no longer supports the use of these tables. This is because the mobile source emission factors used in the tables are from an old version of the California Air Resources Board (CARB) EMFAC model. The current version is EMFAC 2002. Furthermore, the trip generation rates used in the screening tables are from an older version of the Institute of Transportation Engineers (ITE) Trip Generation Manual. The current version is the seventh. To calculate potential adverse construction and operation air quality impacts from the proposed project, the SCAQMD recommends that the lead agency use either the emission calculation methodologies from the Handbook or use the current version of the CARB-approved model URBEMIS 2002, which is available on the SCAQMD website: [www.aqmd.gov/ceqa/models.html](http://www.aqmd.gov/ceqa/models.html).

If quantification of emissions reveals that the project's emissions exceed the established significance thresholds, then mitigation measures must be required by the lead agency to reduce emissions to less than significance.

2. **Diesel Truck Emissions:** The proposed project would generate new 1,105 two-way vehicle trips per day. See page 11 of the Checklist. The lead agency does not state how much of this traffic volume would be comprised of heavy-duty diesel trucks. As a warehouse, the project site would attract some amount of truck traffic. CARB has designated diesel particulates from trucks as a carcinogen. It is therefore important that the truck traffic as well as the project's air quality impacts are adequately analyzed to determine whether or not mitigation would be required. Depending on the volume of truck traffic that would be generated by the proposed project, the SCAQMD recommends that the lead agency perform an air toxics health risk analysis of the diesel particulate emissions. The SCAQMD has prepared interim guidance for preparing such an analysis, which can be accessed at the SCAQMD website: [www.aqmd.gov/ceqa/handbook.html](http://www.aqmd.gov/ceqa/handbook.html) under Health Risk Assessment Guidance.
3. **Intersection Capacity Utilization Analysis:** A project that generates 1,105 vehicle trips per day warrants preparing an intersection capacity utilization (ICU) analysis, to evaluate the proposed project's impacts on intersections in the vicinity of the proposed project. The SCAQMD recommends this analysis because this will determine whether or not a CO hotspots analysis is necessary. The SCAQMD CEQA Handbook recommends that a CO hotspots analysis should be prepared if the project increases the volume to capacity ratio at any intersection rated D or worse by two percent or more. See Chapter 5 for the Handbook for a discussion on analyzing CO hotspots.

4. **Mitigation Measures:** Since the air basin is currently designated as non-attainment for both the federal and state ozone, carbon monoxide and particulate matter (PM10) standards, it is important that the lead agency ensure the implementation of any measures which would help reduce any of these criteria pollutants. The following measures are recommended for the lead agency to consider where applicable or feasible:

- For construction equipment, require the use of alternative clean fuel such as compressed natural gas-powered equipment with oxidation catalysts instead of diesel-powered engines, or if diesel equipment has to be used, use particulate filters, oxidation catalysts and low sulfur diesel as defined in AQMD Rule 431.2, i.e., with less than 15 ppm sulfur content.
- Trucks hauling dirt, sand, gravel or soil are to be covered or shall maintain at least two feet of freeboard in accordance with Section 23114 of the California Vehicle Code.
- Pave parking areas and construction access roads to the main roads to avoid dirt being carried on to the roadway.
- Redirect truck routes to avoid residential areas or schools.
- Use alternative-fueled yard tractors and other service equipment.
- Provide electrical sources for docking of trucks.
- Restrict idling emissions by using auxiliary power units and electrification.
- Enforce truck parking restrictions.
- Improve traffic flow in the project vicinity through signal synchronization.
- Use light-colored roof materials to deflect heat.
- Also use double-paned windows in the facility to reduce thermal loss.
- Install central water heating systems to reduce energy consumption, and
- Install energy-efficient appliances to reduce energy consumption.

Other mitigation measures for consideration by the lead agency can be found in Chapter 11 of the Handbook.