South Coast
Air Quality Management District
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Draft Mitigated Negative Declaration for the Proposed Planning Cases P05-0591 and P05-0931 - Sycamore Business Park

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are a follow up to the comment letter submitted yesterday, October 5, 2005.

The SCAQMD 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
Planning, Rule Development & Area Sources

Attachment

SS:GM

RVC050902-01
Control Number

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Air Quality Analysis

1. It would be helpful if Table 3 (Estimated Daily Construction Emissions) on page 11 of the Air Quality Impact Analysis (AQ Analysis) is clearly labeled unmitigated in the Final CEQA document.

2. In the AQ Analysis section of the Draft MND, the URBEMIS 20002 computer model output sheets for mitigated emissions during the Phase 3 – Building Construction phase, architectural coatings off-gas volatile organic compound (VOC) emissions are shown to be 1,661 pounds per day, which substantially exceed the recommended daily construction significance threshold of 75 pounds per day for VOC. Table 3 on page 11 of the AQ Analysis, however, shows a maximum of 47.84 pounds per day of VOC for emissions generated during construction for architectural coating during building construction. The reason stated by the lead agency for using the 47.84 pounds per day estimate is that the emissions for the project would be the emissions "from the construction of the largest (Building B) to be built first" (page 11 of the AQ Analysis). The lead agency further states in footnote 2 in Table 3 that the maximum emissions would come from the construction of the largest building, building B, which would be built first" (page 11 of the AQ Analysis) and maximum emissions are "the greater of either building construction alone or painting and asphalt." The lead agency appears to have run the model for all buildings that comprise the site and simply assumes that when considered alone, architectural coatings for Building B would not exceed the VOC construction significance threshold. Running the URBEMIS 2002 model for building B (400,000 square feet) still produces VOC emissions that exceed the SCAQMD's VOC significance threshold of 75 pounds per day, resulting in architectural coatings greater than 670 pounds per day. Therefore, unless the lead agency identifies mitigation measures or restricts coating usage to less than 75 pounds per day of VOC emissions (approximately 65 gallons per day), construction VOC emissions should be considered significant.

3. The URBEMIS 2002 operational out put sheets in Appendix B of the Air Quality Impact Analysis show operational emissions for the year 2007 for building B (400,000 square feet) and the year 2008 for buildings B, C, and D (492,310 square feet). These results are reflected in Tables 4 through 9 in the Draft MND. The text states, for example, that tables 4 and 5 show operational emissions for building B only while Tables 6 and 7 show operational emissions from the entire project at build out. The analysis, however, apparently omits from the analysis buildings A and E, which represent 366,000 square feet and 129,565 square feet, respectively. Based on these apparent omissions, the analysis, therefore, substantially underestimates operational air quality impacts for the entire project at build out.

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Air Quality Analysis, cont.

4. Total vehicle trips used in the air quality analysis, 1,024 trips per day (year 2008) are inconsistent and considerably less than the number of vehicle trips identified in the Traffic Impact Study Report, 3,484 Table 4-2. Since vehicle trips contribute directly to emissions, vehicle trips calculated for the traffic analysis should be consistent with the vehicle trips used in the air quality analysis. This discrepancy further supports the SCAQMD's assertion that operational air quality impacts are underestimated.

Local Significance Threshold Analysis

5. Beginning on page 15 of the Air Quality Impact Analysis, the lead agency discusses its methodology for analyzing Local Significance Thresholds (LSTs). It is not clear, however, in the draft CEQA document, how the operational emissions were developed for the LSTs. Please detail how the operational emissions for the LSTs were developed in the Final CEQA document.

6. On page 25 in the LST Analysis, the CEQA document states that a PM10 LST analysis was not done for operational emissions because there is no fugitive dust during the operational phase. PM10 LSTs should be done for operational PM10 emissions whether or not the PM10 would be generated from point or fugitive sources. The lead agency included localized operational PM10 emissions on page 14 of the HRA in the Draft MND (0.033 micograms per cubic meter), which is less than the significance threshold of 2.5 micograms per cubic meter. Therefore, the PM10 concentration from operational emissions would be less than significant. The localized operational PM10 from the HRA should be reported in the LST portion of the Final CEQA document for this project and in future CEQA documents.

Mitigation Measures for Construction Air Quality Impacts

7. Because construction air quality impacts from the proposed project are estimated to exceed established daily significance thresholds for VOCs, the SCAQMD staff recommends that the lead agency consider adding the following mitigation measures to further reduce construction air quality impacts from the project, if applicable and feasible:

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VOC

Recommended Additions:

- Use coatings and solvents with a VOC content lower than required under Rule 1113.
- Construct/build with materials that do not require painting
- Use pre-painted construction materials.
- Restrict daily coating usage to less than approximately 65 gallons per day (assuming a VOC content of 1.1 pound per gallon).

Mitigation Measures for Construction Air Quality Impacts, cont.

Recommended Additions:

- Prohibit all diesel trucks from idling in excess of five minutes, both on-site and off-site.
- 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.
- Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow.
- Schedule construction activities that affect traffic flow on the arterial system to off-peak hour to the extent practicable.
- 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.
- Give preferential consideration to contractors who use clean fuel construction equipment; emulsified diesel fuels; construction equipment that uses low sulfur diesel and is equipped with oxidation catalysts, particulate traps, or other retrofit technologies, etc.

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Mitigation Measures for Operational Air Quality Impacts

8. To mitigate operational impacts, the lead agency selects a number of environmental factors and mitigation measures that may not be applicable to this particular project. For example, the analysis indicates that the nearest sensitive receptor is 1,000 meters from the project site. Further, most workers will be commuting 11.5 miles to the site. Therefore, it is unlikely that pedestrian enhancing infrastructure measures will affect vehicle trips to the project. As a result, credit should not be given for these measures, especially since there is no discussion in the document whether or not transit infrastructure measures are in place or are actually planned for the area when the project becomes fully operational in 2008. Unless transit infrastructure improvements can be documented, trip reduction credit should not be taken for this type of mitigation, especially since there is no discussion of these types of improvements in the list of mitigation measures.

9. Although the operational air quality impacts from the proposed project are currently not estimated to exceed established daily significance thresholds for volatile organic compounds (VOC), carbon monoxide (CO), nitrogen oxide (NO_x), and particulate matter (PM10), the SCAQMD recommends that the lead agency consider the following additional mitigation measures to further reduce operational air quality impacts from the project, if applicable and feasible:

   Recommended Change:

   - MM Air 9: Prohibit all vehicles from idling in excess of ~~ten~~ five minutes, both on-site and off-site.

   Recommended Additions:

   - 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;
   - Design the warehouse/distribution center to ensure that truck traffic within the facility is located away from the property line(s) closest to its residential or sensitive receptor neighbors.
   - Restrict overnight parking in residential areas;

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Mitigation Measures for Operational Air Quality Impacts, cont.

Recommended Additions, cont.:

- 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.
- 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;
- 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;
- Alternative fueled off-road equipment;
- Conduct air quality monitoring at sensitive receptors.