



South Coast Air Quality Management District

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FAXED: JUNE 22, 2006

June 22, 2006

Mr. Patrick McGuckian
County of San Bernardino
Land Use Services Department
385 North Arrowhead Avenue, First Floor
San Bernardino, CA 92415-0182

Dear Mr. McGuckian:

**Land Use Application: Conditional use Permit
APNs: 0234-161-04 and 0234-161-10 (The Alter Group, Ltd.
Calabash III Industrial Building: Fontana**

The South Coast Air Quality Management District (SCAQMD) received the above application and the Air Quality Assessment on June 1, 2006 one day before the close of comment period. The SCAQMD appreciates giving us extra time to submit comments on the above-mentioned documents. 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 environmental document. The SCAQMD would be available 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

SBC060601-06
Control Number

Land Use Application and Air Quality Assessment for Calabash III Industrial Building

1. **Project Air Quality Emissions:** Although the lead agency used URBEMIS 2002 to estimate project air quality impacts, the lead agency failed to provide the entire URBEMIS output printout. Repeated calls to the lead agency failed to produce the needed documentation. In the absence of the output printout and the assumptions that went into the model run, SCAQMD staff is unable to validate the emissions estimates in the tables presented in the Air Quality Assessment (AQA) and to confirm the lead agency's conclusions that the proposed project's air quality impacts will not be significant. It is recommended that the lead agency provide the entire URBEMIS 2002 output printout in the final environmental document and in all future draft CEQA documents.

2. **Diesel Truck Emissions:** On page 18 of the AQA it is stated that the project would generate 1.91 trips per 1,000 square feet. According to the AQA this vehicle trip rate is provided by a National Association of Industrial and Office Properties (NAIOP) memo dated April 19, 2005. SCAQMD recommends the use of trip rates published by the Institute of Transportation Engineers (ITE) manual, current version is the seventh, because these trip rates were developed based on peer reviewed traffic studies evaluated under rigorous guidelines. It is unclear whether an NAIOP memo is an appropriate source of trip rate data. According to the ITE manual, warehouses generate 4.96 trips per square feet. By that criterion, the lead agency has underestimated the proposed project's vehicle trip generation, 2,862 vehicle trips per day (vtpd) compared with the 1,102 vtpd stated in the Air Quality Assessment. Project emissions shown in Table 8 on page 18 of the AQA therefore do not fully account for the proposed project's vehicle trip emissions. Furthermore, with the designation of diesel particulates as a carcinogen by the CARB, the health impacts of diesel particulates from truck traffic need to be assessed. The SCAQMD has prepared a methodology for performing an air toxics health risk analysis for mobile sources. This methodology can be accessed at the SCAQMD website at: www.aqmd.gov/ceqa/handbook/diesel_analysis.doc under Health Risk Assessment Guidance.

3. **Mitigation Measures:** If construction or operational air quality impacts from the proposed project are concluded to be significant, the following measures are recommended for the lead agency to consider where applicable or feasible along with the mitigation measures recommended in the AQA:
 - Maintain equipment and vehicle engines in good condition and in proper tune as per manufacturers' specifications.
 - Require the use of alternative clean fuel such as compressed natural gas-powered equipment with oxidation catalysts instead of gasoline- or diesel-powered engines. However, where diesel equipment has to be used because

there are no practical alternatives, the construction contractor should use particulate filters, oxidation catalysts and low sulfur diesel as defined in SCAQMD Rule 431.2, i.e., diesel with sulfur content of 15 ppm by weight or less. The low-sulfur diesel has the potential to reduce NO_x emissions by 50 percent.

- Require the use of aqueous or emulsified diesel fuel for all construction equipment. Aqueous diesel formulations have received interim verification by the CARB and show a reduction of 16% in NO_x and 60% in PM₁₀ from diesel exhaust. Information of aqueous diesel formulations can be found at the following websites: www.arb.ca.gov/diesel/FAQ.htm#6
- Use electricity from power poles instead of from temporary diesel- or gasoline-powered generators.
- Trucks hauling dirt, sand, gravel or soil are to be covered or should 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.
- Restrict idling emissions by using auxiliary power units and electrification.
- Enforce truck parking restrictions.
- Restrict truck traffic on some routes.
- Provide a minimum of 300-meter buffer zone between truck traffic and sensitive receptors.
- Redirect truck route to avoid residential areas or schools.
- Improve traffic flow through signal synchronization.
- Provide electrical sources for service equipment and docking of trucks.
- Use light-colored roof materials to deflect heat.
- Install solar panels on roof to supply electricity for air conditioning.
- Use double-paned windows 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 SCAQMD CEQA Handbook.