



South Coast Air Quality Management District

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

FAXED: SEPTEMBER 22, 2006

September 22, 2006

Mr. Aron Liang
City of San Bernardino
300 North D Street
San Bernardino, CA 92418

Dear Mr. Liang:

**Draft Environmental Impact Report (DEIR) for
The Lowe's Home Improvement Warehouse at Hallmark Parkway
(August 2006)**

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 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 certification of the Final Environmental Impact Report. 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

SBC060810-01
Control Number

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Lowe's Home Improvement Warehouse at Hallmark Parkway**

Diesel Truck Emissions: The proposed project is expected to generate 7,906 vehicle trips per day. Given the nature of the proposed land use, a considerable proportion of this volume of traffic would be truck trips. With the designation of diesel particulates as a carcinogen by the California Air Resources Board (CARB), the SCAQMD requires that the lead agency demonstrate that the diesel emissions from these trucks will not exceed the cancer risk at the nearest sensitive receptor. SCAQMD recommends that the lead agency perform an air toxics health risk analysis of the diesel truck emissions for the proposed project. The SCAQMD has prepared guidance for conducting such an analysis which can be accessed at the SCAQMD website at: www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.html under Health Risk Assessment Guidance.

Localized Air Quality Impacts: Consistent with the SCAQMD's environmental justice program and policies, the SCAQMD recommends that the lead agency also evaluate localized air quality impacts of the proposed project at the nearest sensitive receptor. SCAQMD staff recommends that for this project and for future projects, the lead agency undertake the localized analysis to ensure that all necessary and feasible mitigation measures are implemented to protect the health of existing or potential sensitive receptors close to the proposed project. The methodology for conducting the localized significance thresholds analysis can be found on the SCAQMD website at: www.aqmd.gov/ceqa/handbook/LST/LST.html.

Carbon Monoxide (CO) Hot Spots Analysis: The SCAQMD CEQA Air Quality Handbook recommends that a CO hotspots analysis be performed for any intersection affected by the proposed project with a rating of C or greater, or if a proposed project increases the volume to capacity ratio at any intersection rated D or worse by two percent or more. Comparing Table III-23 on page III-56 (baseline) to Table III-27 on page III-61, the intersection of University Parkway at Kendall Drive shows a peak hour delay from 40.9 to 42.7, but the level of service staying at D. There is no information on the changes in the volume to capacity ratios. CO hotspots analysis should also be performed for the intersection of University Parkway and Hallmark Parkway since the level of service goes from C to D.

Mitigation Measures: To reduce operational mobile source NO_x emissions, the following measures are recommended for the lead agency to consider where applicable or feasible:

- Maintain equipment and vehicle engines in good condition and in proper tune as per manufacturers' specifications.
- For trucks that would be bringing supplies to the facility, require the use of alternative clean fuel such as compressed natural gas-powered engines or engines equipped with particulate filters and oxidation catalysts, or engines that use 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.
- Restrict idling emissions by using auxiliary power units and electrification.
- Enforce truck parking restrictions.
- Restrict truck traffic on some routes.
- 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.

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