



# South Coast Air Quality Management District

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September 15, 2006

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San Bernardino County Land Use Services Department  
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**Initial Study (IS) and Draft Mitigated Negative Declaration (Draft MND) for the  
Proposed Project No. P200500723 The Alabama Business Center – Industrial  
Warehouse Facility**

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 to the Lead Agency and should be incorporated into the Final Mitigated Negative Declaration (Final MND).

On August 24, 2006 and September 12, 2006 SCAQMD staff requested documentation including the air quality analysis (Webb Associates, December 8, 2006), traffic studies (Kunzman Associates, June 27, 2005, County of San Bernardino Donut Hole Projects Cumulative Traffic Impact Analysis and December 5, 2005, Traffic Contribution Analysis, Alabama Business Center), and health risk assessment (Webb Associates, December 8, 2005). The SCAQMD staff has not yet received this information.

The SCAQMD staff is concerned that based on the number of trips and being a warehouse project, there may be significant health risks from diesel particulate emissions. The SCAQMD staff recommends that the lead agency calculate cancer risks from diesel mobile sources so it can be determined if health risks are significant. The SCAQMD recommends that the CEQA document quantify traffic impacts to include level of service and volume to capacity values for intersections affected by the proposed project and the potential carbon monoxide (CO) hotspot impacts, if applicable for the project. Attached are more detailed comments for the lead agency's consideration.

Mr. John P. McGuckian, AICP  
Senior Associate Planner

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September 15, 2006

Please provide the SCAQMD staff with written responses to all comments contained herein prior to the adoption of the Final Mitigated Negative Declaration. The SCAQMD staff would be happy to work with the Lead Agency. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

Susan Nakamura  
Planning & Rules Manager  
Planning, Rule Development & Area Sources

Attachments

SN:GM

SBC060822-01  
Control Number

### **Air Quality Analysis**

1. The lead agency states on pages 7 and 8 that the URBEMIS 2002 computer model was used to estimate short- and long-term air quality impacts and summary information was provided in the Draft MND. For this and future CEQA documents, the lead agency should include all referenced documents with each draft document to allow the SCAQMD the opportunity to evaluate in a timely manner. The URBEMIS 2002 output files were not provided to the SCAQMD until August 31, 2005 (see also comment #3).

### **Localized Significance Thresholds**

2. Because the proposed site is located less than a quarter-mile from an existing high school (Calvary Chapel High School), a localized air quality analysis is warranted to ensure that the students, faculty and staff at the existing high school site are not adversely affected by the construction activities that are occurring in close proximity. SCAQMD guidance for performing a localized air quality analysis can be found at the following web address: <http://www.aqmd.gov/ceqa/handbook/LST/LST.html> .

### **Transportation and Traffic**

3. In Section XV (a) Transportation/Traffic, the lead agency cites a June 27, 2005 traffic study (Cumulative Traffic Impact Analysis – Kunzman & Associates). This analysis should specifically study potential traffic impacts for the proposed project. Assuming that the traffic analysis is for the proposed project, the Draft MND does not include information from the Traffic Impact Analysis. At a minimum, the lead agency should summarize the findings of the traffic impact analysis by including the levels of service and volume to capacity ratio impacts for the affected project intersections near the proposed project site. In addition, VMT assumptions made in the traffic analysis should be consistent with the VMT used in the air quality analysis.

The traffic study information is important relative to air quality because it will determine whether or not a CO hot spots analysis should be prepared. The lead agency is reminded that all for all intersections affected by the proposed project, a CO hot spots analysis is recommended to be performed for all intersections that experience a volume to capacity increase of two percent or more as a result of a proposed project for intersections rated D or worse.

Should the lead agency, after estimating the proposed project's traffic impacts, believe that a CO hotspots analysis is warranted, please refer to the most current Cal Trans guidance regarding performing a CO hotspots analysis. This information can be obtained at the following internet address:  
<http://www.dot.ca.gov/hq/env/air/coprot/htm> .

### **Health Risk Assessment**

4. In Section III(d) Air Quality, there is a general discussion of diesel emissions from project diesel equipment including on-road trucks and mention is made of cancer risk, but cancer risks from the project have not been calculated. The lead agency further concludes in Section III(d) that (Diesel Particulate Matter) “DPM emissions from diesel trucks generated by the project will not expose sensitive receptors and workers in the project vicinity to significant cancer risks” without demonstrating this conclusion by estimating the cancer risks for this project. Since the California Air Resources Board has designated diesel particulate emissions as a toxic air contaminant and the proposed industrial warehouse project includes potential emissions from diesel trucks idling and queuing, the lead agency should evaluate the associated cancer risks from the diesel particulate emissions at the proposed project. The SCAQMD has developed a methodology for estimating cancer risks from mobile sources in a document entitled Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions. This document can be downloaded from the AQMD’s CEQA web pages at the following URL: [http://www.aqmd.gov/ceqa/handbook/mobile\\_toxic/diesel\\_analysis.doc](http://www.aqmd.gov/ceqa/handbook/mobile_toxic/diesel_analysis.doc).

The HRA Guidance document also contains a list of mitigation measures that are specifically recommended to be used to mitigate diesel exhaust emissions, if applicable and feasible:

Potential Mitigation Measures from the SCAQMD Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions

Truck Idling Facilities

- Provide a minimum buffer zone of 300 meters (roughly 1,000 feet) between truck traffic and sensitive receptors;
- Re-route truck traffic by adding direct off-ramps for the truck traffic or by restricting truck traffic on certain sensitive routes;
- Improve traffic flow by signal synchronization;
- Enforce truck parking restrictions;
- Develop park and ride programs;
- Prohibit all vehicles from idling in excess of five minutes, both on- and off-site;
- Restrict operation to “clean” trucks;
- Provide electrical hook-ups for trucks that need to cool their load;
- Electrify auxiliary power units;
- Use “clean” street sweepers;
- Pave roads and road shoulders;
- Provide onsite services to minimize truck traffic in or near residential areas, including, but not limited to, the following services: meal or cafeteria service, automated teller machines, etc.
- Require or provide incentives to use low-sulfur diesel fuel with particulate traps; and

- Conduct air quality monitoring at sensitive receptors.

In addition, a copy of the Western Riverside Council of Governments (WRCOG) "Good Neighbor Guidelines for Siting New and/or Modified Warehouse/Distribution Facilities" are available directly from WRCOG. The Guidelines were developed through the WRCOG's Regional Air Quality Task Force. The objective of the Guidelines is to provide local governments and developers with a menu of options of strategies that can reduce exposure to diesel particulate from new and/or modified warehouse or distribution centers. The Guidelines include 7 goals, and a variety of strategies for each goal that can be implemented in whole or part. There are a variety of benefits associated with adopting the guidelines, such as reducing the exposure of residents and sensitive receptors to diesel emissions. The Guidelines can be downloaded from the WRCOG web page at the following URL:  
<http://www.wrcog.cog.ca.us/publications/Good+Neighbor+Policies+Final-091205.pdf> .