



South Coast Air Quality Management District

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FAXED: FEBRUARY 9, 2007

February 9, 2007

Ms. Clarice Ramey
Planning Department
City of Ontario
303 East "B" Street
Ontario, CA 91764

Dear Ms. Ramey:

**Draft Supplemental Environmental Impact Report (DSEIR) for the
California Commerce Center - Ontario**

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 Supplemental Environmental Impact Report.

SCAQMD staff is concerned that the health impacts of the proposed project may have been underestimated due to the assumptions used for truck idling and the estimated number of diesel trucks servicing the proposed warehouses. In addition, the project description indicates that there is a rail spur on the project site, however, no analysis for rail emissions is included in the air quality analysis or the health risk assessment.

Attached, please find detailed comments on the DSEIR. 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 Supplemental 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

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

Attachment
SN:CB
Control Number: SBC061226-02

Draft Supplemental Environmental Impact Report (DSEIR) for the California Commerce Center - Ontario

Truck Idling Emissions:

SCAQMD staff is concerned that the health risk assessment underestimated the cancer risk due to the idling assumptions used in the analysis. On page 40 of the *Air Quality Impact and Health Risk Assessment for the Sares-Regis Distribution Center* (December 6, 2006) (AQIHRA), the lead agency assumed only five minutes of idling per truck per day. On page 57 the lead agency assumed ten minutes per truck trip per day or two-five minute idling events, one for vehicle check-in and one while unloading/loading. Please note that although California Air Resources Board allows five minutes per truck trip. The SCAQMD staff recommends that at least 15 minutes is assumed for on-site idling, representing five minutes for check in, five minutes for loading and unloading, and five minutes for check out.

Emissions from Possible Use of Railroad Spur:

Page 2-1 of the DSEIR states that, "The Project incorporates the existing railroad spur located on the site, which provides service between the industrial properties adjacent to the north and the railroad mainline to the south." It appears from the project description that some products will be transported to these industrial warehouses by rail. If the proposed project intends to transport cargo to and from the warehouses by rail, these emissions should be included in the air quality analysis. In addition, the particulate emissions from the additional locomotives that will be delivering cargo to and from the warehouses should also be included in the Health Risk Assessment.

Project Vehicle Impacts:

The proposed project includes six industrial warehouses totaling over 1.9 million square feet. Based on the project description, it would appear that most of the trips would be delivery trucks, primarily heavy-duty diesel delivery trucks. In Table 9 on page 40 of the AQIHRA, it is estimated that the proposed project would generate 1,066 non-diesel vehicles per day and only 321 diesel vehicles per day. Based on other warehouse projects of this size, SCAQMD staff is concerned that the number of diesel vehicles per day may be underestimated. SCAQMD staff recommends that the lead agency provide additional information to substantiate why the number of diesel vehicles is nearly three times less than the non-diesel vehicles for a 1.9 million square foot industrial warehouse project.

Further, the lead agency provides conflicting information on the proposed project's vehicle trip generation. On page 4.4-9 of the DSEIR, the lead agency estimates that a total of 4,325 daily passenger trip equivalents (PCEs) would be generated by the proposed project. On page 34 of the AQIHRA the lead agency estimates a smaller 3,276 PCEs. Since the lead agency used this smaller estimate in the health risk analysis it appears to SCAQMD staff that the health risk impacts may be underestimated. SCAQMD staff would also ask the lead agency to reconcile the number of daily truck trips in Tables 5 and 6 on pages 34 and 35 in the AQIHRA in the Final SEIR.

Proposed Project's Impacts on Schools and Other Sensitive Receptors:

There are three schools located to the south of the proposed project and within a 1 ½-mile radius from the proposed project. These are Creek View Elementary located at 3742 Lytle Creek Place, Mountain View Elementary located at 2825 Walnut Street, and Grace Yokley Middle located at 2947 South Turner Ave. According to Table 4.1-14 on page 4.1-31 of the DSEIR only one school, Mountain View, was modeled for health risk impacts. Creek View Elementary is closer to the proposed project than Mountain View but the lead agency does not explain why this school was not included in the cancer risk analysis. Grace Yokley Middle is also downwind of the proposed project and should be modeled for cancer and other health/hazard risk impacts. On page 44 of the AQIHRA the lead agency provides a description of the grid network and the receptor points used in the analysis, but there is no map to show the grids in relation to the emission sources. Please provide a map showing the emission sources and the receptor grids with actual coordinates used in the modeling. Discrete receptors should also be located at sensitive receptors such as schools, day-care centers, hospitals, etc. in the impact area, i.e., where impacts are greater than one in a million.

Reducing Construction Emissions:

According to Table 4.1-11 on page 4.1-25 of the DSEIR, Reactive Organic Gases (ROG) and Nitrogen Oxides (NO_x) construction emissions would exceed the significance thresholds even after mitigation.

To reduce ROG emissions, the lead agency has proposed mitigation measure AQC-10 on page 4.1-23 which states that during construction activities construction contractors shall use low-volatile organic compound paints. The mitigation measure includes reference to the SCAQMD website for a listing of acceptable paints.

The lead agency states on page 14 of the Air Quality Appendix, Appendix B, that the proposed project is not subject to SCAQMD Rule 1113 – Architectural Coatings. Please note that SCAQMD Rule 1113 does not apply only to the supply, sale or manufacture of architectural coatings. The rule also applies to “any person who applies or solicits the application of any architectural coating within the District (South Coast Air Basin).” Consequently, the proposed project is subject to the rule and should be so noted in the Final SEIR. It should also be pointed out in the main text that SCAQMD Rule 1113 specifies that construction contractors not use paints with more than 100 grams per liter or 0.8 pounds per gallon.

To further reduce ROG emissions, SCAQMD staff recommends the following mitigation measures for consideration where feasible:

- Restrict the number of gallons of coatings used per day.
- Encourage water-based coatings or other low-emitting alternatives.
- Encourage the use of hand application of paints on surfaces instead of using spray guns.

Reducing Operational Emissions:

Table 4.1-6 on page 4.1-17 of the DSEIR shows that the proposed project's operational NO_x and ROG emissions would exceed the SCAQMD-recommended significance thresholds. The lead agency has proposed only five mitigation measures to reduce these emissions. Given that the NO_x emissions exceed the significance thresholds by approximately 200 percent, it is important that the lead agency recommend all feasible mitigation measures to reduce emissions so as to protect public health. The California Air Resources Board (CARB) has designated diesel particulate matter as a carcinogen and has proposed measures to reduce these emissions in its publication *Air Quality and Land Use Handbook: A Community Health Perspective* (April 2005). SCAQMD staff recommends that the lead agency consider the following ARB-recommended measures to be implemented whenever feasible:

- Re-route truck traffic by restricting truck traffic on certain sensitive routes.
- Require installation of electrical sources or electrical hook-ups for service equipment and docking of trucks to eliminate idling of main and auxiliary engines during loading and unloading, and when trucks are not in use.
- Require training of warehouse staff and managers on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks within the facilities.
- Require trucks to be offloaded promptly to prevent trucks idling for longer than five minutes.
- Establish overnight parking within the warehouse complex where trucks can rest overnight.
- Enforce truck parking restrictions.
- Electrify auxiliary power units.
- 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.
- Construction access roads to the main roads should be paved to avoid dirt being carried on to the roadway.
- Use light-colored roofing materials in new construction as opposed to dark roofing materials to deflect heat away from buildings and conserve energy.
- Install solar panels on roof to supply electricity for air conditioning and heating. Use double-paned windows to reduce thermal loss.
- Install central water heating systems to reduce energy consumption.
- Install energy-efficient appliances to reduce energy consumption, and
- Landscape with appropriate drought-tolerant species to reduce water consumption.