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Air Quality Management District
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Ms. Emmy Andrews
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Final Environmental Assessment (Final EA) for the Proposed Construction and Operation of a US Postal Service Delivery Distribution Center

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The SCAQMD would also like to thank the lead agency for the additional time to submit comments. Although the SCAQMD received the Notice of Intent of Preparation of an Environmental Assessment (EA) from the lead agency on May 29, 2007, the SCAQMD did not receive a copy of the Draft EA. On August 22, 2007, the SCAQMD did receive a copy of the Final EA. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Revised Final Environmental Assessment (Revised Final EA).

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final Environmental Assessment. The SCAQMD staff 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, CEQA Section
Planning, Rule Development & Area Sources

Attachment

SS:GM

ORC070822-02
Control Number

Construction and Operation Emission Estimates

1. The analysis prepared by the lead agency shows construction and operation emissions in tons per year. To determine significance, the results are then compared to the Clean Air Act conformity thresholds for the Basin. According to this approach, no construction or operation emissions exceed the applicable conformity threshold for each pollutant. The SCAQMD requests that all air quality analysis results, including both CEQA and NEPA analyses, be shown in pounds per day and compared to the SCAQMD's regional daily significance thresholds. The reason for this request is that nonattainment is determined by daily exceedances in addition to annual exceedances. Further, the SCAQMD requests that daily emissions be based on daily activities, not an analyzed daily average.

   Review of Table 4-1 for the proposed action and Table 4-2 for Alternative 2 shows that operational NOx emissions would exceed the SCAQMD's recommended daily operational significance threshold for NOx of 55 pounds per day. As a result, the SCAQMD requests that the lead agency identify mitigation measures to reduce operational emissions, especially from facility trucks. Suggested mitigation measures for on-road heavy-duty trucks can be found at the following URL: www.aqmd.gov/ceqa/handbook/mitigation/onroad/MM_onroad.html .

2. Upon request, the lead agency provided PDF files of the URBEMIS2002 output sheets and Excel spreadsheets for the consultant's proprietary CNSTEMIS model used to calculate emissions. Staff had difficulty reconciling the results shown in the Tables. For example, both the URBEMIS2002 and the CNSTEMIS output sheets appear to show that emissions from construction equipment would exceed the SCAQMD's recommended construction significance threshold for NOx in 2007. Based on the fact that the spreadsheets appear to show significant daily NOx emissions during construction, the SCAQMD requests that the lead agency identify mitigation measures to reduce daily construction emissions to less than 100 pounds per day of NOx emissions. Suggested mitigation for off-road equipment can be found at the following URL: www.aqmd.gov/ceqa/handbook/mitigation/offroad/MM_offroad.html .

3. The lead agency should be aware that there is an updated version of the URBEMIS model, URBEMIS2007, which includes updated on-road and off-road mobile source emission factors, as well as other enhancements. URBEMIS2007 can be downloaded from the following website: www.urbemis.com .

Localized Air Quality Analysis

4. Because the proposed site is located less than a quarter-mile east and west from existing residential sites, it is recommended that a localized air quality analysis be prepared to determine whether or not the residents in the existing residential sites

are 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 .

CO Hotspots Analysis

5. In the Final EA, the lead agency has noted that four of the ten study intersections listed in Table 4-4 and Table 4-7 on pages 4-26 and 4-45, respectively, show a decline in the level of service in the AM and PM Peak Hours that would warrant a CO hotspots analysis. The SCAQMD recommends performing a CO hotspots analysis if the volume to capacity ratio increases by two percent or more as a result of a proposed project for intersections rated D or worse or if the LOS declines from C to D.

   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

6. In Appendix C Air Quality in Table C3-2, the lead agency projects 198 trips per day for the proposed action from heavy-duty diesel trucks, which emit diesel particulate matter. Diesel particulates have been designated as a carcinogen and it appears that the proposed project will increase diesel particulate emissions at this site from trucks queuing and idling. The SCAQMD therefore recommends that cancer risks be calculated and incorporated in the Revised Final EA. 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 .

Operational Air Quality Impacts – Mitigation Measures

7. Because operational air quality impacts exceed the SCAQMD daily significance threshold for NOx, the SCAQMD recommends that the lead agency consider the following additional mitigation measures to further reduce cumulative operational air quality impacts from the project in conjunction with other similar projects at the distribution center:

   Recommended Additions:

   - Prohibit all vehicles from idling in excess of five minutes, both on- and off-site.

- Create a buffer zone of at least 300 meters (roughly 1,000 feet), which can be office space, employee parking, greenbelt, etc. between the distribution center and sensitive receptors;
- Design the distribution center such that entrances and exits are such that trucks are not traversing past neighbors or other sensitive receptors.
- Design the 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 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;
- Establish overnight parking within the 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;
- 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.