



South Coast  
Air Quality Management District

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Mr. Andres L. Soto, Planning Manager  
City of Colton  
659 N. La Cadena Drive  
Colton, CA 92324

**Draft Environmental Impact Report for the Proposed Agua Mansa Commerce Center (TTM No. 18250/DAP-000-662)**

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 into 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 adoption of the Final Environmental Impact Report. 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:JK:GM

SBC080214-03  
Control Number

### **Construction Air Quality Analysis**

1. In Section 4.1 Air Quality on page 4.1-28 and in the Air Quality Assessment appendix in the Draft EIR, the lead agency states that typically the greatest emissions during construction activities occur during site grading, demolition, and/or excavation. This is generally correct although, depending on the type of project and number of pieces of construction equipment, construction workers, etc., other construction phases, including building construction and asphalt paving, could potentially have higher peak daily emissions than the construction phases identified by the lead agency. Regardless, the analysis only includes site preparation emissions, so SCAQMD staff cannot confirm whether or not other construction phases have higher peak daily emissions. It is recommended that the lead agency include emissions from all construction phases, at a minimum, in an appendix, in the Final EIR for the proposed project and all future CEQA documents so SCAQMD staff can verify peak daily construction emissions.
2. To calculate fugitive dust emissions during site preparation, the lead agency uses the general fugitive dust emission factor from the SCAQMD's CEQA Air Quality Handbook (Handbook). This emission factor is derived from U.S. EPA's AP-42 Emissions Factors document. U.S. EPA states that this emission factor is most applicable to construction activities with "medium activity level." In the project description on page 3.19, the lead agency states that the proposed project will need to import 200,000 cubic yards (yds<sup>3</sup>) of soil to be used to build the foundations of the proposed project. The SCAQMD considers import of 200,000 yds<sup>3</sup> of soil outside the scope of medium activity level as this activity could have substantial fugitive dust and heavy-duty haul truck emissions, which were not evaluated in the Draft EIR. The SCAQMD, therefore, requests that the lead agency calculate air quality impacts from importing 200,000 yds<sup>3</sup> in Table 4.1-9 of the Final EIR, and include the methodologies, assumptions, emission factors, and equations used to support its estimates for the haul trucks, each piece of off-road construction equipment used to unload soil and the soil disturbance impacts. The detailed calculations, etc., could be included in the Air Quality Assessment.
3. On page 3-19 of the Draft EIR, the lead agency states that the project will require approximately 85,227 yds<sup>3</sup> of cut and 372,212 yds<sup>3</sup> of fill necessary to establish building foundations. Similar to comment #2, the construction analysis does not include fugitive dust from cut-and-fill operations and does not likely include off-road mobile sources of emissions from construction equipment performing cut-and-fill operations. The SCAQMD, therefore, requests that the lead agency calculate air quality impacts from cut-and-fill operations; include the results in Table 4.1-9 of the Final EIR; and include the methodologies, assumptions, emission factors, and equations in the Air Quality Assessment.
4. Although the lead agency has performed a localized CO hotspots intersection analyses, a localized significance threshold analysis, as recommended by the SCAQMD, has not been performed for mobile sources at a fixed location, e.g., off-road construction equipment. According to the lead agency, nine sensitive receptors

are located within 2.2 miles of the proposed project. Therefore, the SCAQMD requests that the lead agency evaluate localized air quality impacts to ensure that any nearby sensitive receptors 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> .

### **Operational Emissions**

5. In the analysis of operational air quality impacts on pages 4.1-34 and 4.1-35 of the Draft EIR, the lead agency calculates on-road mobile source emissions by using the trip rate calculated in the "Traffic and Circulation" section, converting truck trips into passenger car equivalents (PCEs) (one truck trip equals 2.5 PCEs), using an average one-way trip length of 11.9 miles, and using passenger car emission factors. There are several problems with this approach that potentially leads to underestimating on-road mobile source emissions, at least for some pollutants. First, the trip length for all trips, 11.9 miles per trip, is the recommended trip rate for worker commute trips. The SCAQMD assumes that average haul truck trip lengths are 40 miles one-way. Further, even multiplying the passenger car emission factor by the PCE ratio of 2.5 results in a lower emission factor for some pollutants than using the heavy-duty truck emission factor. Therefore, the SCAQMD recommends that the lead agency recalculate mobile source emissions in the Final EIR by using the actual fleet characteristics (i.e., total number of daily trips by passenger cars, medium-duty trucks, and heavy-duty trucks, use the applicable trip length for each vehicle category (11.9 miles per one-way trip for passenger vehicles and 40 miles per one-way trip for haul trucks), and use the appropriate emission factors for each vehicle category.

### **Health Risk Assessment**

6. The HRA documentation provided in the Draft EIR is not clear and did not provide a means for verification of the HRA analysis. Upon request by SCAQMD staff Mr. Martin Beale of Mestre Greve Associates provided additional documentation via e-mail. The Final EIR should include the clarification provided by Mr. Martin Beale. Future CEQA documents provided by the lead agency should include documentation of assumptions and calculations used along with references to sources used, both hard copies and electronic versions. The documentation should allow the public and commenting agencies to verify and reproduce the analysis if needed.
7. Single receptors along the roadway were used estimate health risk values. Mr. Martin Beale of Mestre Greve Associates explained in a telephone discussion that aerial photos were used to place the receptors along the roadway. Since single receptors were used it is unclear if concentrations estimated are truly peak concentrations. Gridded receptors would better demonstrate that the peak values were captured. Please place receptor grids for the Final EIR according to either SCAQMD Mobile Source HRA Guidance ([http://www.aqmd.gov/ceqa/handbook/mobile\\_toxic/mobile\\_toxic.html](http://www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.html)) or Rules

1401/212 Guidance

(<http://www.aqmd.gov/prdas/Risk%20Assessment/RiskAssessment.html>).

### **Mitigation Measures for Construction Air Quality Impacts**

8. Because the lead agency has determined that the short-term air quality impacts from the proposed project are estimated to exceed established daily significance thresholds for nitrogen oxide (NO<sub>x</sub>), particulate matter (PM<sub>10</sub>) fugitive dust, and volatile organic compounds (VOC), the SCAQMD recommends that the lead agency consider modifying Mitigation Measures AQ-2 and AQ-3 and adding additional mitigation measures to further reduce NO<sub>x</sub>, PM<sub>10</sub> fugitive dust, and VOC construction air quality impacts from the project, if applicable and feasible:

#### **PM<sub>10</sub> (fugitive dust) - Recommended additions:**

- Install wheel washers where vehicles enter and exit the construction site onto paved roads or wash off trucks and any equipment leaving the site each trip;
- Apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more);
- Replace ground cover in disturbed areas as quickly as possible;
- Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 mph;
- All trucks hauling dirt, sand, soil, or other loose materials are to be covered;
- Apply water three times daily, or non-toxic soil stabilizers according to manufacturers' specifications, to all unpaved parking or staging areas or unpaved road surfaces;
- Pave road and road shoulders;
- Traffic speeds on all unpaved roads to be reduced to 15 mph or less; and
- Sweep streets at the end of the day if visible soil is carried onto adjacent public paved roads Use street sweepers that comply with SCAQMD Rules 1186 and 1186.1 (recommend water sweepers with reclaimed water).

#### **NO<sub>x</sub> - Recommended Changes to Mitigation measure AQ-2:**

- Use low emission mobile construction equipment. The property owner/developer shall comply with CARB requirements for heavy construction equipment-, i.e., require construction equipment that meet or exceed Tier 2 standards and equip construction equipment with oxidation catalysts, particulate traps, or other verified/certified retrofit technologies, etc.
- Maintain construction equipment ~~engines by keeping them tuned~~ according to factory specifications.

#### **NO<sub>x</sub> - Recommended additions:**

- Prohibit all vehicles from idling in excess of five minutes, both on-site and off-site;
- Require construction equipment that meet or exceed Tier 2 standards; use emulsified diesel fuels; and equip construction equipment with oxidation catalysts, particulate traps, or other verified/certified retrofit technologies, etc.;
- Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow;
- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site;
- Use alternative clean fueled off-road equipment or give extra points in the bidding process for contractors committing to use such equipment;
- Use street sweepers that comply with SCAQMD Rules 1186 and 1186.1 (recommend water sweepers with reclaimed water);
- Reroute construction haul trucks away from congested streets or sensitive receptor areas; and
- Improve traffic flow by signal synchronization.

#### VOC

##### Recommended Changes to Mitigation measure AQ-3

- Limit the amount of painting each day (the lead agency should specify the gallons per day limit). ~~(To reduce emissions to below the significance threshold, daily painting would need to be reduced so that it would take approximately 1,5 years to complete the painting).~~

#### **Mitigation Measures for Operational Air Quality Impacts**

7. The lead agency has determined that that project-specific operational air quality impacts from the proposed project are estimated to exceed the NO<sub>x</sub>, CO, and VOC daily significance thresholds (see comment #1). In addition to Mitigation Measure AQ-4 on page 4.1-35, the SCAQMD recommends that the lead agency consider the following revisions and additional mitigation measures to further reduce project-specific health risks and operational air quality impacts from the project:

##### Recommended Additions:

- Re-route truck traffic by adding direct off-ramps for the truck traffic or by restricting truck traffic on certain sensitive routes;
- Design the warehouse/distribution center such that entrances and exits are such that trucks are not traversing past neighbors or other sensitive receptors;
- Provide a minimum buffer zone of 300 meters between truck traffic and sensitive receptors;

- Design the warehouse/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 warehouse/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;
- Re-route truck traffic by restricting truck traffic on certain sensitive routes;
- Restrict overnight parking in residential areas;
- Establish overnight parking within the warehouse/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;
- Identify or develop secure locations outside of residential neighborhoods where truckers that live in the community can park their truck, such as a Park & Ride;
- Use street sweepers that comply with SCAQMD Rules 1186 and 1186.1;
- Enforce any local truck parking restrictions;
- Develop park and ride programs;
- Restrict operation to “clean” trucks;
- Electrify service equipment at facility;
- Provide electrical hook-ups for trucks that need to cool their load;
- 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, services such as meal or cafeteria service, automated teller machines, etc.;
- Require or provide incentives for haul/delivery trucks to use low-sulfur diesel fuel with particulate traps; and
- Conduct air quality monitoring at sensitive receptors.