South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

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djohnson@fontana.org

Mr. DiTanyon Johnson
Community Development, Planning
8353 Sierra Avenue
Fontana, CA 92335

Review of the Draft Environmental Impact Report (Draft EIR) for the Proposed Sierra Warehouse Industrial Project

The South Coast Air Quality Management District (SCAQMD) staff 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 (Final EIR) as appropriate.

The SCAQMD staff is concerned about the project's significant regional operational air quality impacts from the new industrial land use identified in the proposed project. Therefore, the SCAQMD staff recommends that the Lead Agency revise the Draft EIR to incorporate additional mitigation measures that minimize the project's significant air quality impacts pursuant to Section 15126.4 of the California Environmental Quality Act (CEQA) Guidelines. Further, SCAQMD staff notes that the Draft EIR's methodology to determine the project's fleet mix could result in underestimated air quality impacts. Details regarding these and other comments are attached to this letter.

Pursuant to Public Resources Code Section 21092.5, SCAQMD staff requests that the Lead Agency provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. Further, staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,

Ian MacMillan
Program Supervisor, CEQA Inter-Governmental Review
Planning, Rule Development & Area Sources

Attachment
IM:DG
SBC1301004-04
Control Number

Mitigation Measures for Operational Air Quality Impacts (Mobile Sources)

1. The Lead Agency's operational air quality analysis demonstrates significant air quality impacts from NOx and VOC emissions. These impacts are primarily from mobile source emissions related to vehicle trips associated with the proposed project. While some nominal mitigation measures have been included in the Draft EIR, there may be feasible opportunities to reduce emissions even further. Therefore, the Lead Agency should consider reviewing and incorporating additional transportation mitigation measures, such as those listed below.

   a) Require the use of 2010 and newer diesel haul trucks[1] (e.g., goods/materials delivery trucks) and if the Lead Agency determines that 2010 model year or newer diesel trucks cannot be obtained the Lead Agency shall use trucks that meet EPA 2007 model year NOx emissions requirements.
   b) Have truck routes clearly marked with trailblazer signs, so that trucks will not enter residential areas,
   c) Improve traffic flow by signal synchronization,
   d) Provide food options, fueling, truck repair and or convenience stores on or near the site to minimize the need for trucks to traverse through residential neighborhoods,
   e) Electrify service equipment at facilities (e.g., forklifts and yard hostlers). Where it is not feasible for equipment to be electrically powered the Lead Agency should ensure that it is not fueled by diesel,
   f) Promote clean truck incentive programs (see the discussion below regarding Cleaner Operating Truck Incentive Programs), and
   g) Provide electric vehicle (EV) Charging Stations (see the discussion below regarding EV charging stations).

   Cleaner Operating Truck Incentive Programs

   The Lead Agency should require that all future tenants apply for incentive funding (such as VIP, Carl Moyer, etc.) to upgrade their fleet. If they are awarded funding, they should also be required to use it within a reasonable period of time. At a minimum, the project should require that all tenants provide information and promote incentive programs and available alternatively fueled truck technologies. This information should be updated as needed to ensure that the most recent information is available.

   Electric Vehicle (EV) Charging Stations

   Trucks that can operate at least partially on electricity have the ability to substantially reduce the significant NOX impacts from this project. Further, trucks that run at least partially on electricity are projected to become available during the life of the project as discussed in the 2012 Regional Transportation Plan. It is important to make this electrical infrastructure available when the project is built so that it is ready when this

[1] Several projects in SCAQMD have committed to 2010 trucks as a component of their project, including the National Orange Show warehouse project that recently started construction. http://blog.pe.com/cassie-macduff/2013/09/23/san-bernardino-long-awaited-project-at-orange-show-launched/

technology becomes commercially available in the near future. The cost of installing electrical charging equipment onsite is significantly cheaper if completed when the project is built compared to retrofitting an existing building. Therefore, the SCAQMD staff recommends the Lead Agency require each warehouse and other project areas that allow truck parking to be constructed with the appropriate infrastructure to facilitate sufficient electric charging for trucks to plug-in. Similar to the City of Los Angeles requirements for all new projects, the SCAQMD staff recommends that the Lead Agency require at least 5% of all vehicle parking spaces (including for trucks) include EV charging stations[1]. At a minimum, the electrical panels should be sufficiently sized to allow future upgrades and wiring should be provided to docks.

Mitigation Measures for Operational Air Quality Impacts (Other Area Sources)

2. In addition to the mobile source mitigation measures identified above the Lead Agency should incorporate the following onsite area source mitigation measures below to reduce the project's overall significant regional air quality impacts from NOx and VOC emissions during operation. These mitigation measure should be incorporated pursuant to CEQA Guidelines §15126.4

    a) Maximize use of solar energy including solar panels; installing the maximum possible number of solar energy arrays on the building roofs and/or on the Project site to generate solar energy for the facility. The project applicant should commit to applying to the local utility to install the maximum number of solar panels possible.
    b) Require all lighting fixtures, including signage, to be state-of-the art and energy efficient, and require that new traffic signals have light-emitting diode (LED) bulbs and require that light fixtures be energy efficient compact fluorescent and/or LED light bulbs. Where feasible use solar powered lighting.
    c) Maximize the planting of trees in landscaping and parking lots.
    d) Use light colored paving and roofing materials.
    e) Use passive heating, natural cooling, solar hot water systems, and reduced pavement.
    f) Utilize only Energy Star heating, cooling, and lighting devices, and appliances.
    g) Install light colored "cool" roofs and cool pavements.
    h) Limit the use of outdoor lighting to only that needed for safety and security purposes.
    i) Require use of electric lawn mowers and leaf blowers.
    j) Require use of electric or alternatively fueled sweepers with HEPA filters.
    k) Use of water-based or low VOC cleaning products.

Fleet Mix/Trip Rate (Air Quality Analysis)

3. The Draft EIR includes a traffic study that uses trip rates other than those recommended as defaults for air quality analysis in the CalEEMod guidance. The proposed project will primarily support goods movement in the region, however,

[1] http://ladbs.org/LADBSWeb/LADBS_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf

based on Table 2-1 of Appendix J (Traffic and Transportation) the project analysis assumes that only approximately 12% of the proposed total vehicular trips are generated by heavy-heavy duty trucks (HHDTs) from a total of 20% trucks. The Lead Agency indicates that it derived this fleet mix from the Truck Trip Generation Study (City of Fontana, 2003). However, the ITE Trip Generation Manual (published in 2012) referenced in the Draft EIR and used to determine the project's overall trip rate indicates that a higher truck percentage may be more appropriate for the proposed land use. Specifically, the ITE Trip Generation Manual assumes that 38% (0.64 trips per 1,000 ft^2 of building space) of the fleet mix consists of trucks.[2] Therefore, the SCAQMD staff recommends that if the CalEEMod guidance is not used that all of the rates recommended in the ITE Manual be used. The Final EIR should revise the analysis to account for this potentially higher truck volume (i.e., consistent with the ITE Trip Generation Manuel) or incorporate mitigation and monitoring measures that achieve the following:

Truck and/or Emissions Cap

a) Limits the volume of trucks at the project site to be consistent with Table 2-1 (Project Trip Generation Summary) of the Traffic and Transportation Appendix, or
b) Demonstrates that emissions generated by the project site do not exceed the emissions levels disclosed in the Draft EIR, and

Contingency Measure

c) Provides a contingency plan that ensures any exceedance of the estimated daily truck volumes or emissions levels are mitigated to levels consistent with the Draft EIR.

In the event that the any potential exceedance of the estimated daily truck volumes or emissions levels cannot be mitigated to levels consistent with the Draft EIR the additional environmental impacts from such exceedances should be considered pursuant to CEQA guidelines.

Further, goods movement operational activities fluctuate based on seasonality and from warehouse to warehouse. For example, goods movement activity often increases at the end of the year with back-to-school and holiday seasons. Given that SCAQMD regional significance thresholds are based on peak daily emissions, the Final EIR should include a discussion about whether the final trip rates used are average rates or peak rates.

Refrigerated Warehouse Space Emissions Calculations

4. Based on a review of the emissions calculations in the Draft EIR (see CalEEMod outputs of Appendix C: Air Quality and Greenhouse Gas Emissions) it appears that the Lead Agency determined the project's air quality impacts using emission factors for unrefrigerated warehouses/truck activity, however, mitigation measure MMAIR-1f appears to allow for refrigerated warehouse uses. The SCAQMD staff acknowledges the air quality benefits of mitigation measure MMAIR-1f that requires electrical hookups for Transportation Refrigeration Units and other onboard auxiliary

[2] ITE Trip Generation Manual, 9th Edition, Volume 2, page 267.

equipment, but the use of unrefrigerated warehouse emissions factors may underestimate the project's regional air quality impacts if a refrigerated warehouse is constructed. Therefore, SCAQMD staff recommends that the Lead Agency revise the air quality analysis to account for potential emissions from refrigerated warehouses.

Onsite Truck Travel Emission Calculations

5. Table 2-2 through 2-4 in the Health Risk Assessment (HRA) present the calculated emission rates from truck travel associated with the project. The onsite travel includes an estimate of 128 onsite truck trips per day (64 each on the north and south sides of the building). It is not clear why onsite trips only account for approximately one half of the 255 daily truck trips associated with the project. This discrepancy should be clarified in the Final EIR.

Dispersion Modeling Files

6. The dispersion modeling files used for the HRA were not included in the files provided to SCAQMD staff. Although the text of the HRA indicates that the input files can be found in Appendix A, it appears that only the output files from the modeling are provided without any input information. As indicated in our NOP comment letter dated June 28, 2013, SCAQMD staff is not able to complete its review of the EIR without these files. We therefore cannot confirm the validity of the dispersion modeling analysis or the HRA at this time.