



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

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Liang_Ar@sbcity.org

Mr. Aron Liang, Senior Planner
Development Services
300 North D Street
San Bernardino, CA 92418

Review of the Draft Mitigated Negative Declaration (MND) for the Shipping Container Storage Yard 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 CEQA document as appropriate. We appreciate consideration of these late comments as we did not receive the technical appendices until July 16.

Reliance on Previous Air Quality Analysis

SCAQMD staff notes that the Draft MND relies on a regional air quality analysis conducted for the previously approved 'Robert's Lumber Sales' project for this site. The air quality analysis concludes that because this project would serve fewer vehicles that air quality impacts would be lower. However, it is not clear that the vehicle mix would be equivalent between the two projects. The projected 72 non-employee daily trips serving this project will almost certainly be composed solely of heavy-duty diesel trucks that can transport shipping containers. These types of trucks have substantially higher emissions than a typical fleet mix (composed mostly of light duty passenger vehicles) serving commercial/industrial developments such as the previously approved project. Further, this amount of vehicle traffic indicates that the onsite offroad diesel equipment (specified as a Hyster sidepick) will be operating for extended periods of time to handle all of the onsite container movement. We also note that based on the Traffic Analysis provided to SCAQMD staff that only 6 total truck trips were assumed in the previous project analysis. Similarly, the URBEMIS analysis indicates that only approximately 5% of vehicle trips would be heavy duty diesel trucks and that trip lengths would be less than 13 miles on average.

SCAQMD staff therefore recommends that the regional air quality analysis be updated to include an evaluation of emissions from all truck activity associated with this project, including an analysis of full trip distance taking containers back to the ports. The analysis should also include the emissions from onsite trucking activity, including idling

and onsite movement. Lastly the analysis should include the emissions from the onsite offroad diesel equipment.

Trip Generation Rate

It is unclear to SCAQMD staff how the trip generation rate for this site was derived. The site appears capable of storing more than 2000 containers/trailers. If so, it is not clear how the project proponents determined that only 36 containers would arrive/leave each day. Because SCAQMD regional thresholds are based on peak daily values, additional explanation should provide the rationale for the chosen trip generation rate, and whether it represents a reasonable peak day rate.

Health Risk Assessment

It appears that the location of the project requires any truck accessing the site to travel adjacent to homes and schools to access the freeway system. Because these heavy duty trucks will emit diesel particulate matter, a recognized carcinogen, SCAQMD staff recommends that the lead agency conduct a health risk assessment to determine if project emissions will pose a potentially significant health risk to area residents.

SCAQMD Contact Information

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 CEQA document. Further, staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact me at (909) 396-3244, if you have any questions regarding the enclosed comments.

Sincerely,



Ian MacMillan

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

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