



South Coast  
Air Quality Management District

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

E-Mailed: December 21, 2010  
Rahhal\_Te@sbcity.org

December 21, 2010

Ms. Terri Rahhal  
Community Development Department  
City of San Bernardino  
300 North "D" Street, 3<sup>rd</sup> Floor  
San Bernardino, CA 92418-0001

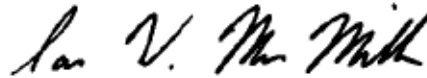
**Review of the Mitigated Negative Declaration (MND)**  
**for the Cajon Ancillary Truck Trailer Storage Area Project**

The South Coast Air Quality Management District (AQMD) 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 revised or final CEQA document as appropriate.

The AQMD staff is concerned that the lead agency has failed to quantify the cumulative air quality and health risk impacts of the proposed project combined with the Cajon Distribution Center (CDC). In addition to the 300 diesel truck trips per day (tpd) facilitated by the proposed project the CDC can facilitate 622 diesel truck tpd resulting in 922 diesel truck tpd in the project area. However, the lead agency failed to quantify the potential cumulative air quality and health risk impacts from the proposed project. Further, the lead agency did not quantify the additional regional daily diesel truck trip emissions from the proposed project resulting in a potential underestimate of the project's regional air quality impacts. Without accurately quantifying the project's cumulative air quality impacts, health risk impacts and operational emissions impacts the lead agency is unable to support its conclusion that the project will have less than significant air quality impacts. Therefore, AQMD staff requests that the lead agency revise the CEQA document to include a revised air quality analysis that accounts for the cumulative air quality impacts, health risk impacts and regional operational emissions impacts from the proposed project. In the event that the lead agency's revised CEQA document demonstrates significant adverse air quality impacts the AQMD staff recommends that the lead agency require mitigation pursuant to Section 15370 of the CEQA Guidelines.

AQMD staff is available to work with the lead agency to address these issues and any other air quality 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,

A handwritten signature in black ink that reads "Ian V. MacMillan". The signature is written in a cursive, slightly slanted style.

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

Attachment

[IM:DG](#)

SBC101123-08  
Control Number

### Cumulative Air Quality Impacts

1. Given the proposed project is an “ancillary use” to the CDC project located adjacent the project site the AQMD staff is concerned that the lead agency has not evaluated the cumulative air quality and health risk impacts of the proposed project combined with the CDC. The cumulative air quality and health risk impacts identified in the draft MND should account for the baseline emissions from the CDC project area (622 diesel truck tpd)<sup>1</sup> and the potential emissions generated from the proposed project (300 diesel truck tpd) resulting in a total of 922 diesel truck tpd (622 diesel truck tpd from the CDC + 300 diesel truck tpd from the proposed project = 922 diesel truck tpd). To ensure that the requirements of CEQA Guidelines Section 15065 and Section 15130 regarding cumulative impacts are satisfied, AQMD staff recommends that the lead agency revise the MND to include quantification of the cumulative local and regional air quality impacts and health risk impacts from the proposed project and make a significance determination in the final CEQA document.

### Quantification of Operational Emissions

2. The AQMD staff is concerned that the lead agency has failed to quantify all operational emissions from the proposed project resulting in an underestimate of air quality impacts. On page IS 2 of the draft MND the lead agency states that the proposed project will be a “ancillary use” that provides up to 300 additional truck trailer parking spaces for the CDC facility located directly north of the project site. Further, on page IS 3 the lead agency states that the proposed project will be connected to the CDC parking area by a driveway that will be used to transfer truck trailers between the two sites. As a result, it appears that the proposed project can facilitate an additional 300 regional diesel truck trips per day (tpd) to the CDC facility for the delivery of goods. Therefore, the lead agency should revise the draft MND to include offsite diesel truck emissions from the additional 300 regional daily truck trips that could be generated by the proposed project.

### Air Quality Mitigation Measures

3. In the event that the lead agency determines that the revised air quality analysis requested in comment #1 and #2 results in significant adverse air quality impacts (e.g., significant regional, localized, health risk and/or greenhouse gas emissions impacts) the AQMD staff recommends that the lead agency require mitigation pursuant to Section 15370 of the CEQA Guidelines that minimizes or eliminates these impacts. Specifically, the AQMD staff recommends that the lead agency adopt mitigation measures that other lead agencies have found feasible, such as those listed below.
  - Tier IV yard tractors dedicated to project operations
  - Restrict the operation to the use of 2010 and newer diesel haul trucks (e.g., crude oil transfer trucks and material delivery trucks),

---

<sup>1</sup> Based on the Air Quality Appendix and data provided to AQMD by the lead agency’s staff on December 16, 2010.

- Require or provide incentives for diesel exhaust particulate traps that meet CARB certified level 3 requirements,
- Avoid siting any new sensitive land uses within 1,000 feet of the project,
- Restrict truck traffic on sensitive routes,
- Develop, adopt and enforce truck routes both into and out of the city and into and out of the facilities,
- Have truck routes clearly marked with trailblazer signs, so trucks will not enter residential areas,
- 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, lodging, mechanics, ATM's, etc.
- Design the project such that entrances and exits discourage trucks from traversing past neighbors or other sensitive receptors,
- 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,
- Improve traffic flow by signal synchronization,
- Enforce truck parking restrictions,
- Develop park and ride programs,
- Prohibit truck idling in excess of five minutes, on- and off-site, and
- Electrify all service equipment at the facility.

In the event that the lead agency believes that the proposed project will not result in any additional truck trips as described in comment #1 and #2 the lead agency should adopt enforceable mitigation that restricts the volume of heavy duty truck trips for the entire CDC (including the proposed project area) to the existing CEQA baseline level (622 trips per day) identified in the final EIR for the CDC. Without this mitigation measure or additional analysis, the lead agency has not provided substantial evidence that project impacts will be less than significant.