



# South Coast Air Quality Management District

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December 9, 2013

Mr. Manuel Baeza, Principal Planner  
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210 E. Citrus Avenue  
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## **Draft Mitigated Negative Declaration (Draft MND) for the Proposed Redlands Logistics Center (CUP No. 1008, Parcel Map No. 19437)**

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.

The proposed project includes a 1.013 million square foot warehouse distribution center with unknown occupants on an approximately 50.54 acre site. Project construction will begin in the fall of 2013 with opening year scheduled for 2015. Operational air quality impacts were estimated using the California Emissions Estimator Model (CalEEMod) assuming a trip rate and vehicle fleet mixture percentages that differ from CalEEMod recommended guidance. Use of the non-default CalEEMod assumptions without an occupant specific traffic study can underestimate potentially significant operational air quality impacts. In addition, some of the mitigation measures used in the CalEEMod analysis to reduce project impacts to a less than significant level are not applicable to all trips for this land use. The effectiveness of these mitigation measures should be reconsidered after reviewing the detailed comments attached to this letter. If air quality impacts are found to be significant, mitigation measures are available to reduce this impact to a less than significant level.

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final CEQA document. The SCAQMD staff is available 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.

Mr. Manuel Baeza,  
Principal Planner

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December 9, 2013

Sincerely,

A handwritten signature in black ink that reads "Ian V. MacMillan". The signature is written in a cursive style with a large, stylized "I" and "M".

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

IM:GM

SBC131101-05  
Control Number

## **Air Quality Analysis - Operations**

### **Non-Default Trip Rate and Fleet Mixture Percentage**

1. Air quality impacts were estimated in the Air Quality Analysis using the California Emissions Estimator Model (CalEEMod). The model's default trip rate of 2.59 per 1,000 square feet of building space for the high-cube warehouse land use was changed using a non-default trip rate of 1.68 per 1,000 square feet (Land Use Code 152) based on the ITE Trip Generation Manual (2012), 9th Edition. Using the 1.68 non-default trip rate, the Lead Agency estimates approximately 340 daily truck trips for the proposed project assuming 20.43 percent of total vehicle trips are trucks. This compares with 1,050 daily trucks using the default 2.59 trip rate and a 40 percent fleet mixture percentage for trucks recommended in the CalEEMod User's Guide (User's Guide).<sup>1</sup> Absent an occupant specific traffic study and given the possibility that a perspective occupant could have greater truck activity levels than analyzed using the non-default assumptions, the SCAQMD staff recommends that project impacts be estimated using the User's Guide's guidance in order to avoid underestimating operational impacts.

Should the Lead Agency choose to use the lower trip rate and fleet mixture, then project conditions of occupancy should be added to ensure that the project is limited to the specified numbers of trucks and lower percentage of trucks analyzed in the air quality and other applicable analyses.

### **Effectiveness of Mitigation Measures in CalEEMod Analysis**

2. The CalEEMod analysis includes the application of several mitigation measures, including a ride-share program. This ridesharing program results in a 15% reduction in vehicle miles travelled (VMT) for the project. Although ride sharing programs can be effective in reducing employee trips, it is not appropriate to assume that ridesharing can reduce impacts from trucking associated with the project. As the majority of the VMT associated with this project is from trucking, this measure should be re-evaluated to determine its effectiveness. In order to properly account for this mitigation measure in CalEEMod, the analysis should split trucking VMT from employee VMT before applying the mitigation. SCAQMD staff is available to assist in evaluating this mitigation measure.

### **Mitigation Measures for Operational Air Quality Impacts (Mobile Sources)**

3. Based on recommended revisions to the air quality and health effects analyses (see cover letter and comment 1), significant operational impacts may be demonstrated including NOx emissions and health risk impacts from diesel particulate matter, which are primarily from mobile source emissions related to on-road vehicle trips associated with the proposed project. In addition to the measures proposed by the

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<sup>1</sup> CalEEMod User's Guide, Appendix E, Large Warehouse and Distribution Center Trip Rates

<sup>2</sup>[http://ladbs.org/LADBSWeb/LADBS\\_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf](http://ladbs.org/LADBSWeb/LADBS_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf)

Lead Agency starting on page 53 of the Draft MND, the SCAQMD staff therefore recommends the following transportation related mitigation measures that should be incorporated in the Final MND in order to reduce the project's significant air quality impacts.

- a. Require the use of 2010 compliant diesel trucks, or alternatively fueled, delivery trucks (e.g., food, retail and vendor supply delivery trucks) at commercial/retail sites upon project build-out. If this isn't feasible, consider other measures such as incentives, phase-in schedules for clean trucks, etc.
- b. Have truck routes clearly marked with trailblazer signs, so that trucks will not enter residential areas.
- c. Re-Route truck traffic by restricting truck traffic on certain sensitive routes.
- d. Develop, adopt and enforce truck routes both in and out of city, and in and out of facilities. ;
- e. Prohibit all vehicles from idling in excess of five minutes, both on- and off-site.
- f. Improve traffic flow by signal synchronization.
- g. Promote clean truck incentive programs (see the discussion above regarding Cleaner Operating Truck Incentive Programs), and
- h. Provide electric vehicle (EV) Charging Stations (see the discussion below regarding EV charging stations).

#### **Alternative Fueled Truck Phase-In Schedule**

4. Should the proposed project generate significant regional emissions, the Lead Agency should require mitigation that requires accelerated phase-in for non-diesel powered trucks. For example, natural gas trucks, including Class 8 HHD trucks, are commercially available today. Natural gas trucks can provide a substantial reduction in health risks, and may be more financially feasible today due to reduced fuel costs compared to diesel. In the Final CEQA document, the Lead Agency should require a phase-in schedule for these cleaner operating trucks to reduce project impacts. SCAQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency and project applicant.

#### **Electric Vehicle (EV) Charging Stations**

5. 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

technology becomes commercially available. 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 the proposed warehouse and other plan 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<sup>2</sup>. Further, electrical hookups should be provided at the onsite truck stop for truckers to plug in any onboard auxiliary equipment. At a minimum, electrical panels should appropriately sized to allow for future expanded use.

### **CNG Fueling Station and Convenience Site**

6. Should the proposed project generate significant regional NOx operational impacts after revision, the SCAQMD staff recommends that the project pro-actively take measures that could reduce emissions sooner rather than later. The SCAQMD staff therefore recommends that the Lead Agency ensure the availability of alternative fueling facility (e.g., natural gas) to serve the project site prior to operation of any logistics warehousing within the project area.

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

7. 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 regional air quality impacts from NOx emissions during operation, if further revisions to the air quality impact analysis prove that operational NOx impacts are significant. 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.
  - 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. Utilize only Energy Star heating, cooling, and lighting devices, and appliances.
  - f. Install light colored "cool" roofs and cool pavements.

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<sup>2</sup>[http://ladbs.org/LADBSWeb/LADBS\\_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf](http://ladbs.org/LADBSWeb/LADBS_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf)

- g. Limit the use of outdoor lighting to only that needed for safety and security purposes.
- h. Require use of electric or alternatively fueled sweepers with HEPA filters.
- i. Use of water-based or low VOC cleaning products.