



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:
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October 29, 2013

Ms. Lorelee Farris, Project Planner
Planning Division
Development Services Department
City of Redlands
P.O. Box 3005
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Draft Mitigated Negative Declaration (Draft MND) for the Proposed California Street High-Cube Distribution Warehouse (Planned Development No. 1/Parcel Map No. 19496)

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.

In the project description, the lead agency proposes the construction of a 771,839 square foot warehouse distribution center on an approximately 35.59 acre site for occupants that are not known at this time. Based on the traffic study, 265 of the total vehicle trips would be made by trucks with the site plan also showing 122 dock doors. However, following the guidance for the land use computer model (CalEEMod User's Guide), the number of daily truck trips could be as high as 800. The proposed project will take about 10 months to complete with construction scheduled to begin in January 2014 and be completed at the end of October 2014.

The SCAQMD staff recommends that the Air Quality Impact Analysis (AQIA) be revised in the Final CEQA document based on the following concerns given that specific tenant traffic characteristics are unknown at this point of the CEQA process: 1) the trip rate used; 2) the truck vehicle fleet mixture percentage, and 3) the use of the weighted-average to estimate on-road mobile trip lengths including warehouse trucks. Should the lead agency determine after it has revised the air quality analysis that operational impacts exceed the SCAQMD recommended significance thresholds, feasible mitigation measures should be incorporated into the Final CEQA document to reduce any air quality impacts below significance levels. Details are included in the attachment.

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.

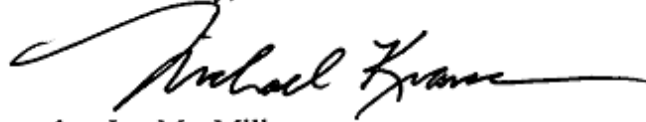
Ms. Lorelee Farris,
Project Planner

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October 29, 2013

Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael H. MacMillan". The signature is fluid and cursive, with a long horizontal stroke at the end.

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

IM:MK:GM

SBC131003-01
Control Number

Air Quality Analysis - Operations

1. In the air quality analysis modeling using the California Emissions Estimator Model (CalEEMod) to estimate project air quality impacts, the lead agency overrode the default trip rate of 2.59 per 1,000 square feet of building space for the high-cube warehouse land use. Instead, the lead agency used a trip rate of 1.68 per 1,000 square feet (Land Use Code 152) based on the ITE Trip Generation Manual (2012), 9th Edition. Further, in Table 4-1 in the Traffic Study, the proposed project assumes that only 20.43 percent (Fontana Study¹) of the proposed project's total trips are generated by trucks. Absent an occupant specific traffic study, guidance from the CalEEMod User's Guide² recommends the following modeling assumptions for project specific high-cube warehouse projects that involve 10 or less warehouses: 1) the project should assume the User Guide's 40 percent trucks (as a percentage of overall vehicle trips) as a more appropriate assumption for the proposed land use to avoid underestimating the number of trucks visiting the warehouse facilities, and 2) the modeling should use the more conservative, worst-case CalEEMod default trip rate value of 2.59 in the Final CEQA document. The SCAQMD therefore recommends that the lead agency revise the air quality analysis in the Final CEQA document for the high-cube warehouse use portion of the project using a more appropriate truck population based on the fleet mixture and trip rate. Using the recommended CalEEMod fleet mixture and trip rate would decrease the possibility of underestimating potential air quality impacts. Should the lead agency choose to use the lower fleet mixture and trip rate, then project conditions of occupancy should be added to ensure that the project is limited to the specified lower percentage of trucks analyzed in the air quality analysis.
2. The SCAQMD staff has concerns about the weighted average trip lengths assigned to the vehicle fleet mixture and their effect on the on-road operational air quality estimates in the Air Quality Impact Analysis (AQIA). The SCAQMD staff is concerned that the use of the weighted average trip lengths significantly underestimates on-road mobile source emission estimates in the Draft MND. Based upon the trip lengths included for each vehicle fleet mixture category on pages 27-28 of the AQIA, daily NO_x operational impacts were estimated by SCAQMD staff to be potentially greater than the recommended daily significance threshold of 55 pounds of NO_x per day. Rather than using the vehicle miles traveled by weighted average, the SCAQMD staff recommends revising the Final CEQA document using the vehicle miles traveled for each vehicle category established by the lead agency in the AQIA. Should the lead agency determine after it has revised the air quality analysis that operational impacts exceed the SCAQMD recommended significance thresholds, feasible mitigation measures should be incorporated into the Final CEQA document to reduce any air quality impacts below significance levels.

¹ Truck Trip Generation Study, City of Fontana, Heavy Warehouse (August 2003)

² CalEEMod User's Guide, Appendix E, Large Warehouse and Distribution Center Trip Rates

Mitigation Measures for Operational Air Quality Impacts (Mobile Sources)

3. Based on recommended revisions to the air quality analysis (see cover letter and comments 1 and 2), significant operational impacts may be demonstrated including NOx emissions, which are primarily from mobile source emissions related to on-road vehicle trips associated with the proposed project. 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. Improve traffic flow by signal synchronization.
 - d. Provide food options, fueling, truck repair and or convenience stores on-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 above regarding Cleaner Operating Truck Incentive Programs), and
 - g. Provide electric vehicle (EV) Charging Stations (see the discussion below regarding EV charging stations).
 - h. Require a 1,000 foot buffer between the site loading dock area and any sensitive receptor pursuant to guidance from the California Air Resources Board Air Quality and Land Use Handbook, which is available at:
<http://www.arb.ca.gov/ch/landuse.htm> .

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 stations³. 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)

³http://ladbs.org/LADBSWeb/LADBS_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf

- 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.
 - 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.