



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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Mitigated Negative Declaration (MND) for the Proposed Alliance CA Gateway South Building 9 Project (Proposed Project)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The City of San Bernadino is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. The following comments recommended revisions to the health risk assessment analysis, California Emissions Estimator Model (CalEEMod) analysis, and information about South Coast AQMD permits and responsible agency that the Lead Agency should include in the Final MND.

South Coast AQMD Staff's Summary of Project Information in the MND

Based on the MND, the Proposed Project proposes developing an approximately 397,400-square-foot industrial warehouse and office building with associated site improvements on approximately 9.12 acres of the total 18.43 net acres site.¹ The Proposed Project is located near the southeast corner of Lean Road and East Norman Road, with the East Norman Road bounds to the north, East Orange Show Road to the south, Leana Road to the west, and existing industrial uses and Santa Ana River to the east.² The Proposed Project site currently contains non-conforming residential structures, truck and material storage yards, a rig welding company, and vacant land with sparse vegetation on the western portion.³ On the easter portion, the Proposed Project site currently contains non-conforming residential structures, a towing service, vacant lands, and a storage yard for trucks and heavy construction equipment.⁴ The Proposed Project would provide 62 dock doors⁵ associated with 88 daily truck trips.⁶ Trucks primarily access the Proposed project site via driveways along East Norman Road (eastern portion) and East Orange Show Road (western portion).⁷ Based on the aerial photographs, South Coast AQMD staff finds that the nearest sensitive receptors (e.g., residences) are 145 ft south of the Proposed Project site. The construction of the Proposed Project is expected to commence in June 2023 and last through June 2024.⁸

¹ MND. Page 7.

² *Ibid.* Page 5.

³ *Ibid.* Page 6.

⁴ *Ibid.*

⁵ *Ibid.* Page 7.

⁶ *Ibid.* Appendix K. Page 8.

⁷ *Ibid.* Page 7.

⁸ *Ibid.* Appendix A. Page 41.

South Coast AQMD Staff's Comments on the MND*Health Risk Assessment (HRA) Analysis*Averaging Time Utilized in Construction and Operational HRA Analysis

Based on the construction and operational HRA modeling files, the averaging time for the analysis is ANNUAL.⁹ However, according to the South Coast AQMD Risk Assessment Procedures v8.1¹⁰ and South Coast AQMD Modeling Guidance for AERMOD,¹¹ the detailed HRA utilizing AERMOD should be run using the averaging time PERIOD and 1-hour. Since the construction and operational HRAs of the Proposed Project using ANNUAL, South Coast AQMD staff recommend that the Lead Agency re-run the construction and operational HRAs utilizing PERIOD and 1-hour averaging time to determine the health risk impacts to the sensitive receptors and off-site workers and include the revised results in the Final MND. If the revision is not included in the Final MND, the Lead Agency should provide reasons for not having them supported by substantial evidence in the record.

Building Downwash Option in Operational HRA Modeling

Based on the South Coast AQMD staff review, the HRA modeling file does not include the building downwash option in the operational HRA. The ground-level pollutant concentrations near the building would be underestimated if the downwash effects were absent in the dispersion modeling. Therefore, building downwash should be considered for the Proposed Project operation in order to predict more accurate ground-level concentrations. In addition, the truck idling emissions would need to be estimated separately and included in the dispersion modeling analysis and HRA as point sources. However, the operational HRA modeling file indicates those emissions as line volume source types. Thus, truck idling emissions should be modeled as point sources with a building downwash option selected.

In addition, it needs to be clarified in the Final MND if the stationary combustion engines (e.g., diesel firewater pump, diesel emergency generator, etc.) will be used on-site during operation. If any of these will be used when implementing the Proposed Project, they will need to be added as additional sources to the HRA and dispersion modeling files. Therefore, South Coast AQMD staff recommend that the Lead Agency revise the operational HRA modeling by incorporating the above recommendations and including the HRA results in the Final MND. If the HRA modeling is not revised and included in the Final MND, the Lead Agency should provide reasons supported by substantial evidence in the record to explain why the revision is not included.

California Emissions Estimator Model (CalEEMod) Analysis

The Proposed Project utilizes CalEEMod version 2022.1¹² to calculate the Proposed project's emissions from construction and operational activities and includes the CalEEMod output files in Appendix A: Air Quality Impact Analysis. South Coast AQMD staff has the following concerns

⁹ *Ibid.* Appendix B2 – Mobile Source Health Risk Assessment. Pages 98 and 269 of PDF.

¹⁰ South Coast AQMD Risk Assessment Procedures v8.1. Access at: <http://www.aqmd.gov/docs/default-source/permitting/rule-1401-risk-assessment/riskassessproc-v8-1.pdf>

¹¹ South Coast AQMD Modeling Guidance for AERMOD. Access at: <http://www.aqmd.gov/home/air-quality/meteorological-data/modeling-guidance>

¹² *Ibid.* Appendix A: Air Quality Impact Analysis. Page 37.

regarding the CalEEMod output files and recommends that the Lead Agency review and revise the CalEEMod analysis and include the revision in the Final MND.

User-Defined Industrial Land Use Subtype

In the operational CalEEMod output files, besides the “unrefrigerated warehouse-no rail” land use subtypes, “user-defined industrial” is added.¹³ According to the CalEEMod User Guide, the “user-defined” may be selected to characterize project land use subtypes that are not included in CalEEMod. If selected, all data on the Land Use screen will need to be input manually.¹⁴ However, the size metric, lot acreage, and the floor square area use are all set to zero under the “user-defined industrial” land use subtype. In addition, the truck information (e.g., truck trips) is input under the “user-defined industrial” but not in the “unrefrigerated warehouse-no rail” land use subtype. This possibly leads to underestimating the heavy-duty truck emissions for warehouse activities since no data is filled under this “user-defined industrial” land use subtype.

Therefore, South Coast AQMD staff recommends that the Lead Agency explain why the land use is separated in the CalEEMod analysis; why the truck information is not under the “unrefrigerated warehouse-no rail” land use subtype and includes the explanation in the Final MND. If the explanation is not included in the Final MND, the Lead Agency should provide reasons for not having them supported by substantial evidence in the record.

South Coast AQMD Permits and Responsible Agency

If implementing the Proposed Project would require new stationary equipment, including but not limited to emergency generators, fire water pumps, boilers, etc., permits from South Coast AQMD are required. The Final MND should include a discussion on stationary equipment requiring South Coast AQMD permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project. Any assumptions used for the stationary sources in the Final MND will also be used as the basis for the permit conditions and limits for the Proposed Project. Please contact South Coast AQMD’s Engineering and Permitting staff at (909) 396-3385 for questions on permits. For more general information on permits, please visit South Coast AQMD’s webpage at: <http://www.aqmd.gov/home/permits>.

Conclusion

Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process. Please provide South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, responses should provide sufficient details giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision-makers and the public who are interested in the Proposed Project.

¹³ *Ibid.* Appendix A: Air Quality Impact Analysis. Page 196 of PDF file.

¹⁴ California Emissions Estimator Model (CalEEMod) Version 2022.1 User Guide. Access at: https://www.caleemod.com/documents/user-guide/CalEEMod_User_Guide_v2022.1.pdf

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Danica Nguyen, Air Quality Specialist, at dnguyen1@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

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Planning, Rule Development & Implementation

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