



South Coast
Air Quality Management District

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

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Mr. Michael Kissell
15625 East Stafford, Suite 100
P.O. Box 3366
City of Industry, CA 91744-0366

**Notice of Availability of a Draft Supplemental Environmental Impact Report (SEIR)
for the Industry Business Center**

The South Coast Air Quality Management District (SCAQMD) 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 SEIR or final project approvals.

SCAQMD staff acknowledges that the CEQA document for the proposed project has been certified. However, the decision making body has not yet held a public hearing to approve the project. According to *Bakersfield Citizens for Local Control v City of Bakersfield*, 124 Cal App 4th 1184 (2004), at page 1201, if a public hearing is conducted on project approval, then new environmental objections could be made until close of this hearing... Therefore, the SCAQMD requests that the lead agency incorporate this comment letter into the administrative record for the proposed project and consider the comments attached herein.

As acknowledged in the Draft SEIR, air quality impacts from the proposed project are expected to exceed most of the SCAQMD's recommended regional significance thresholds for construction and operation by a wide margin and are also expected to exceed the localized thresholds for PM_{2.5} and PM₁₀ by a relatively large margin during construction. In addition, the localized construction air quality analysis was prepared using an inappropriate air quality dispersion model, which likely underestimates emission concentrations at sensitive receptors. The correct model should be used to remodel localized air quality impacts to ensure that operational impacts are not significant.

To assist the lead agency with further reducing air quality impacts from the proposed project, SCAQMD staff recommends additional measures to assist the lead agency with further reducing significant adverse construction and operational air quality impacts. The SCAQMD staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Dr. Steve Smith, Program Supervisor – CEQA Section, at (909) 396-3054, if you have any questions regarding the enclosed comments.

Sincerely,

A handwritten signature in black ink that reads "Steve Smith". The signature is written in a cursive, slightly slanted style.

Steve Smith, Ph.D.
Program Supervisor – CEQA Section
Planning, Rule Development & Area Sources

Attachment

SS:DG
LAC0 80930-09
Control Number

Air Quality Analysis - Localized Significance Threshold for Construction

1. SCREEN3 was used to estimate localized NO_x, CO, PM₁₀ and PM_{2.5} concentration impacts during the construction phase of the proposed project. The highest NO_x, CO, PM₁₀ and PM_{2.5} emissions would occur from August 2009 to December 2009 of the construction phase. All emission sources were modeled as a single area source of 467.7 acres. It does not appear that air dispersion modeling accurately characterizes localized air quality impacts from the proposed project because of the size of the project site construction activities will vary, the occurrence of various construction activities at different locations on the project site (trenching – west side, asphalt paving – west side, and mass grading – east side), and the grading emissions generated by URBEMIS were restricted to a smaller area of 53.7 acres per day.

It is inappropriate to model emissions generated for 53.7 acres per day over an area source representation of 467.7 acres. According to the URBEMIS file only 214.9 acres would be disturbed over the period of August 2009 through December 2009. Modeling emissions generated from 53.7 acres disturbed per day over an area source of 467.7 acres results in inappropriately low concentrations. This is true of similar construction activities. Modeling should be redone using areas that appropriately correspond to those used for estimating the emissions values in the URBEMIS Model. In addition, if the analysis relies on the assumption that 53.7 acres are disturbed per day, a mitigation measure should be included to prohibit the construction contractors from disturbing more than approximately 54 acres per day.

2. SCREEN3 is limited to estimating localized air quality concentration impacts at receptors using the assumption that emissions are generated from a single source. Due to the size of the proposed project site and the distribution of construction activities that are spread across the proposed project site SCREEN3 does not appear to be the appropriate model to use to estimate concentrations at receptors. ISCST3 should be used for its ability to use representative meteorological data, model multiple sources and model complex terrain.
3. Operational emissions were also modeled using SCREEN3 using the assumption that all emissions are generated by a single area source of 467.7 acres. This assumption is not appropriate because operational emissions are primarily restricted to the parking lot. The operational emissions should be modeled over an area source that is equivalent to the area of the parking lots.
4. SCREEN3 was run with the meteorology options of a 10-meter wind speed of 2.24 meters per second and a stability class of 6. When SCREEN3 is used the worst-case meteorology options should be assumed.
5. SCREEN3 cannot model complex terrain (i.e., terrain where the sources and areas are at different elevations). The topography of the proposed project site and surrounding areas (receptor locations) are not flat. Since ISCST3 has the ability to model complex terrain it should be used to model the projects construction activities, operational activities and receptors.

Air Quality Analysis -Construction Emissions

6. The Lead Agency provided the projected construction air quality impact results for the proposed project on page 5.2-21 and 5.2-22 of the Environmental Analysis and on page(s) 22 through 30 of the Air Quality Study (AQS) in the SEIR. The results demonstrate that the revised project would generate VOC, NO_x, PM₁₀ and PM_{2.5} emissions that exceed the SCAQMD's recommended regional significance thresholds. The Lead Agency proposes a list of measures to mitigate some of these emissions; however, the Lead Agency does not quantify the emissions reduced from these mitigation measures or disclose the residual impacts. SCAQMD staff recommends that the effectiveness of mitigation measures and project design features be quantified, where emission reduction control efficiencies are known, and the resulting mitigated emissions calculated to provide the public with a more accurate estimate of construction emissions from the project.
7. In addition to the construction mitigation measures provided by the Lead Agency SCAQMD staff recommends that the Lead Agency consider adding the following mitigation measures to further reduce air quality impacts from the project, if feasible:

NO_x:

- Require off-road construction equipment to meet or exceed Tier 3 standards with available CARB verified technologies or use construction fleets that comply with SCAQMD Rule 2449 provisions, or
- Alternatively, require the use of alternative fueled off-road construction equipment, and
- Reroute construction trucks away from congested streets or sensitive receptor areas.

The following emission reduction measure should be modified as follows:

- PDF 2-1 (previously referred to as PDF 5.10-7): Operating equipment in an idling mode shall ~~be minimized~~ not idle for more than five minutes. All equipment should be turned off when not in use. ~~, to the extent feasible.~~
- MM 2-1: Minimize obstruction of through-traffic lanes. When feasible, construction should be planned so that lane closures on existing streets are kept to a minimum. ~~If necessary, a flag person shall be retained to maintain the safety adjacent to existing roadways.~~ Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow.
- MM 2-2 (previously referred to as IBC MM 5.2-2): Dedicated turn lanes and/or other roadway improvements shall be provided as appropriate at heavily congested roadways. *SCAQMD staff recommends that the lead agency reference the mitigation measures in Chapter 5.10 Transportation and Traffic so the public is aware that there are specific roadway improvement project identified that will serve to reduce congestion and provide associated air quality benefits.*

Fugitive Dust:

- Require the application of non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more),
- Install wheel washers where vehicles enter and exit the construction site onto paved roads or wash off trucks and any equipment leaving the site,
- Require all trucks hauling dirt, sand, soil, or other loose materials to be covered,
- Suspend all excavating and grading operations when wind gusts (as instantaneous gusts) exceed 25 mph,
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation,
- When sweeping streets to remove visible soil materials use SCAQMD Rule 1186 and 1186.1 certified street sweepers or roadway washing trucks, and
- Replace ground cover in disturbed areas as quickly as possible.

VOC

- Use coatings and solvents with a VOC content lower than that required under SCAQMD Rule 1113,
- Construct or build with materials that do not require painting, and
- Require the use of pre-painted construction materials.

For additional measures to reduce off-road construction equipment, refer to the mitigation measure tables located at the following website:

www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html.

Air Quality Analysis - Operational Emissions

8. Review of the traffic analysis in Chapter 5.10 and the trip numbers used in the operational air quality analysis shows a slight discrepancy. For example, on page 5.10-29 the lead agency states that during phase 1 the peak daily trips occur on a weekday with a game and are 50,700 trips per day. Review of the URBEMIS2007 output files in Appendix C show that the model calculated on-road mobile source emissions during a weekday with a game using a daily trip number of 50,172. Similarly, at full build-out in 2015, the lead agency states on page 5.10-30 that peak daily trips of 62,837 are expected to occur during a weekday with a game. The URBEMIS output sheet in Appendix C shows that mobile source air quality impacts were calculated using a peak number of 62,314. Although revising the air quality analysis to use traffic estimates consistent with the traffic analysis is not expected to change the conclusions regarding air quality impacts, the lead agency may wish to revise the analysis for accuracy and full disclosure to the public.

9. According to the analysis of localized operational impacts, the proposed project would not create significant adverse localized air quality impacts to nearby sensitive receptors. However, given the fact that the proposed project will attract a large number of vehicles per day, especially weekdays with games (62,837 trips per day), the SCAQMD recommends that the lead agency require a buffer of at least 500 feet between the parking facilities and the nearest sensitive receptor. This buffer zone is based on the recommended buffer zone between sensitive receptors and high traffic locations.
10. On page 35 of the AQS the Lead Agency discusses prohibition of charcoal and wood fired barbeques and proceeds to calculate the overall operational emissions using propane emission factors for all barbeque activities. If it is the intent of the Lead Agency to prohibit the use of charcoal or wood fired barbeques SCAQMD staff recommends that Lead Agency include a mitigation measure that prohibits the use of these units in the Final SEIR. If the Lead Agency determines that such mitigation is not feasible the overall operational emissions value should be re-calculated to include the appropriate emissions factor.
11. Similar to comment #1, the Lead Agency provided the projected operation air quality impact results for the proposed project in Tables 5.2-10 and 5.2-11 on pages 5.2-28 and 5.2-29, respectively, in the SEIR. The results demonstrate that the revised project would generate VOC, NO_x, CO, PM₁₀ and PM_{2.5} emissions that exceed the SCAQMD's recommended regional significance thresholds. The Lead Agency proposes a list of measures to mitigate some of these emissions; including roadway and intersection improvements, shuttle bus service from the Metro station on game days, etc., however, the Lead Agency does not quantify the emissions reduced from these mitigation measures or disclose the residual impacts. SCAQMD staff recommends that the effectiveness of mitigation measures and project design features be quantified, where emission reduction control efficiencies are known and the resulting mitigated emissions be calculated to provide the public with a more accurate estimate of construction emissions from the project.
12. As indicated in the analysis of the proposed project's operational air quality impacts in Appendix C, the majority of emissions result from on-road mobile sources, primarily passenger vehicles, traveling to and from the site. The lead agency lists two specific traffic mitigation measures on page 5.2-48. In addition to the two traffic mitigation measures provided by the Lead Agency SCAQMD staff recommends that the Lead Agency consider adding the following mitigation measures to further reduce air quality impacts from the project, if feasible:
 - SCAQMD staff recommends that the lead agency make it clear that mitigation measure 2-2 on pages 5.2-46 and 5.2-47 apply to operational impacts.
 - Modify PDF 2-2 on page 5.2-17: The stadium shall lease or purchase a shuttle fleet of at minimum of 9 internal parking lot shuttle buses and 18 Metrolink shuttle buses that can accommodate a minimum of 40 passengers for service during a major stadium event. All shuttle buses to the Metrolink stadium and internal parking lot shuttle buses shall be fueled in order of preference by: 1) electric motors or 2) Liquefied Natural Gas (LNG). *X number of additional shuttles shall be leased or purchased to provide shuttle service from residential subdivisions to the facility.*

- Provide preferential parking spaces for low emission vehicles, including alternative fuel vehicles, hybrid vehicles that qualify for freeway carpool lanes, etc.; carpools; and van pools and provide seven foot two-inch minimum vertical clearance in parking facilities for van pool access.
- Provide preferential parking and electricity charging stations for electric vehicles.
- Implement home dispatching system where employees receive routing schedules by phone rather than driving to work, especially on game days.
- Require retail, restaurant, and the stadium to offer travel incentives such as discounts on purchase for transit riders, carpoolers, etc.
- Construct off-site bicycle facility improvements, such as bicycle trails linking the facility to designated bicycle commuting routes or on-site improvements such as bicycle paths, bicycle parking facilities, etc.
- Charge visitors to park.
- Set up paid parking systems where drivers pat at a walkup kiosk and exit via a stamped ticket to reduce emissions from queuing vehicles.
- Provide employees with discounted bus passes.
- Require retail tenants to implement compressed work week schedules where weekly work hours are compressed into fewer than five days, e.g., 9/80, 4/10, etc.
- Provide commuter information areas or provide a facility-wide rideshare coordinator to provide information to employees on rideshare matching information.
- Provide real time information on parking availability in the parking structures to minimize the time it takes to find available parking.
- Provide direct ingress and egress ramps from State Routes 57/60.
- As noted in the Draft SEIR, the intersection of Grand Avenue and the future A Street will be operating at an LOS of "F" in 2011 and 2015. Although the lead agency is requiring a number of roadway improvements and fair share cost mitigations to reduce transportation/traffic impacts, additional consideration should be given to further reducing congestion related to shuttle trips transporting passengers to and from the parking lot east of Grand Avenue to retail and stadium venues west of Grand Avenue.