



South Coast
Air Quality Management District

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April 27, 2010

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Community Development
City of Banning
99 East Ramsey
Banning, CA 92220

Draft Recirculated Mitigated Negative Declaration (Draft RMND)
for the Proposed Banning Business Park

AQMD staff appreciates the opportunity to comment on the above-mentioned document. The comments included in this letter are intended as guidance for the lead agency and should be considered prior to certification of the Final CEQA document.

AQMD staff is concerned that operational air quality impacts in the Draft RMND may have been substantially underestimated and may significantly exceed the recommended AQMD daily regional significance thresholds for operations. Contrary to the recommendation of AQMD staff in our April 21, 2009 comment letter on the original Draft RMND (attached), the lead agency continues to rely on a trip rate that does not appear to match the proposed land use. The proposed project includes more than 1,000,000 square feet of warehouse and industrial space with greater than 150 loading docks. In addition, the project design will require large volumes of heavy duty diesel trucks to travel 7 days per week, 24 hours per day in close proximity to residents. The proposed facility entrance is only 65 feet from the closest residence, and the proposed truck route to the Interstate 10 freeway is adjacent to existing housing. Further, based on AQMD staff modeling, regional operational impacts appear to be significant. The AQMD staff therefore recommends that an Environmental Impact Report be prepared and circulated in accordance with CEQA Guidelines §15002(f)(1) and §15064(a)(1) and that the applicable air quality analyses be completed incorporating the attached comments.

AQMD staff strongly suggests that the lead agency consider the recommendations from the Western Riverside Council of Governments (WRCOG) "Good Neighbor Guidelines for Siting New and/or Modified Warehouse/Distribution Facilities". Additional mitigation measures included in the attached comments are recommended to reduce operational impacts to the residents and other sensitive receptors impacted by project operations.

Ms. Zai Abu Bakar,
Community Development

April 27, 2010

Please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final CEQA document. The AQMD staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Ian MacMillan, Program Supervisor – Inter-Governmental Review, at (909) 396-3244, if you have any questions regarding these comments.

Sincerely,



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

Attachments:
IM:JK:GM

SBC100325-02
Control Number

OPERATIONAL AIR QUALITY ANALYSIS

Regional Thresholds

As stated on page 18 of the Draft RMND, regional NO_x emissions are anticipated to reach 54 pounds per day for both Phase 2 and Phase 3 operations. This level is just below the threshold utilized in the Draft RMND of 55 pounds per day. Because of this small margin of safety, the following comments are meant to guide the lead agency to carefully reconsider potential impacts, and include more stringent enforceable mitigation measures to ensure that impacts remain as low as possible.

1. UREBEMIS Trip Rates

In Table 15 – Trip Generation Rates on page 74 of the Traffic Impact Study (KOA Corporation, December 2009) and in the URBEMIS computer model output sheets for operational emissions, the lead agency has changed the URBEMIS2007 default trip rate from 4.96 to 1.44 trips per 1,000 square foot under the High Cube Warehouse land use type resulting in substantially fewer operational trips and vehicle miles traveled. This drastic reduction in trip rate may not be appropriate given that in Buildings 11 and 12 alone there are 133 loading docks, and only 1353 total daily trips (URBEMIS output). Of the 1353 trips, no more than 18%, or 244 trips are counted as heavy duty (Lite-Heavy through Heavy-Heavy classification) trucks in the URBEMIS model. This averages to less than 2 truck trips per dock per day. Without further justification, it is difficult to determine if this very low trip rate is appropriate. If the lead agency concludes that this condition is true, then an enforceable mitigation measure that limits the truck throughput at these facilities to less than 244 total truck trips per day should be specified in the Final CEQA document prepared for this project.

2. Discrepancy Between Traffic Study and Air Quality Study

Table 17 of the Traffic Study indicates that over 12% of the truck trips will be with 4+ axle trucks, generally indicating a Heavy-Heavy classification. However, the URBEMIS fleet mix only includes 1.8% Heavy-Heavy trucks. As all of these vehicles are likely to use diesel fuels with high emissions, further justification of truck trip rates is needed prior to finalization of the CEQA process for this project. In the Final CEQA document, the number of total daily trips used should be consistent throughout the document's air quality analysis, traffic study, health effects study, etc., performed by the lead agency.

3. Potential for Significant Air Quality Impact

If the lead agency believes that the 1.44 trips per 1,000 square foot rate is appropriate, detailed documentation should be provided in the Final CEQA document that demonstrates that the trip rate is appropriate for the land use and its inland location. Otherwise, the AQMD recommends that operational impacts should be revised accordingly in the URBEMIS model using the more conservative default 4.96 trip rate in the Final CEQA document. Based on modeling done by AQMD staff using the 4.96 per 1,000 feet default trip rate and the lead agency's average truck trip one-mile distance of 27 miles as entered in the lead agency's URBEMIS modeling, the

proposed project may exceed the AQMD recommended daily operational regional significance thresholds. If significant impacts are identified by the lead agency, AQMD staff recommends that an Environmental Impact Report be prepared and circulated in accordance with CEQA Guidelines §15002(f)(1) and §15064(a)(1) and that all feasible mitigation measures be considered to reduce the magnitude of these impacts.

Localized Thresholds

4. Operational Hours

As stated on page 25 of the Draft RMND “*Trucks are assumed to operate 24 hours per day and 7 days per week.*” However, in the Localized Significance Threshold model files sent to AQMD staff, only 8 daytime hours were included. The remaining 16 hours of emissions were not calculated. The lead agency is encouraged to either include a mitigation measure limiting operations to 8 hours per day, or to revise the modeling to include a full 24 hour day of operations. Results from this revised modeling should be compared with localized significance thresholds to determine the potential significance of the project in the Final CEQA document.

5. Annual Thresholds

In Table 7 on page 20 of the Draft RMND, NO₂ (1-hour) and PM₁₀ (24-hour) thresholds and concentrations are presented for the proposed project. While neither of these short term thresholds is exceeded, annual standards were not considered. The Final CEQA document should include a discussion and modeling of potential annual impacts from NO₂ and PM₁₀ in comparison with AQMD thresholds available here: <http://www.aqmd.gov/ceqa/handbook/signthres.pdf>

MITIGATION MEASURES

6. Good Neighbor Guidelines

The Western Riverside Council of Governments (WRCOG) “Good Neighbor Guidelines for Siting New and/or Modified Warehouse/Distribution Facilities” were developed to provide local governments and developers with a menu of options of strategies that can reduce exposure to diesel particulate from new and/or modified warehouse or distribution centers. The Guidelines were developed through the WRCOG’s Regional Air Quality Task Force. The Guidelines include 7 goals, and a variety of strategies for each goal that can be implemented in whole or part. There are numerous benefits associated with adopting the guidelines, including reducing the exposure of residents and other sensitive receptors to diesel emissions. The Guidelines can be downloaded from the WRCOG web page at the following URL: <http://www.wrcog.cog.ca.us/downloads/Good+Neighbor+Policies+Final-091205.pdf> . Any questions pertaining to the Guidelines can be directed to WRCOG at (951) 955-7985.

7. Additional Mitigation Measures

Should the lead agency determine (see comments #1 and #2) that operational air quality impacts from the proposed project exceed the AQMD recommended regional daily significance thresholds, the AQMD staff recommends that the lead agency consider adding the following mitigation measures in addition to those listed on page 24 of the Draft RMND to further reduce operational air quality impacts from the project, if applicable and feasible:

Recommended Additions:

- Prohibit all diesel trucks from idling in excess of five minutes, both on-site and off-site;
- Restrict operations to “clean trucks,” such as a 2007 or newer model year or 2010 compliant vehicle;
- Create a buffer zone of at least 300 meters (roughly 1,000 feet), which can be office space, employee parking, greenbelt, etc. between the warehouse/distribution center and sensitive receptors;
- Re-route truck traffic by adding direct off-ramps for the truck or by restricting truck traffic on certain sensitive routes;
- Improve traffic flow by signal synchronization;
- Use street sweepers that comply with AQMD Rules 1186 and 1186.1;
- Conduct air quality monitoring at sensitive receptors ;
- Use alternative fueled off-road equipment;
- Design the warehouse/distribution center such that entrances and exits are such that trucks are not traversing past neighbors or other sensitive receptors;
- Design the warehouse/distribution center such that any check-in point for trucks is well inside the facility property to ensure that there are no trucks queuing outside of the facility;
- Require the warehouse/distribution center to clearly define the primary entrance and exit of the warehouse/distribution center;
- Restrict overnight parking in residential areas;
- Enforce truck parking restrictions;
- Establish overnight parking within the warehouse/distribution center where trucks can rest overnight;
- Establish area(s) within the facility for repair needs;
- Require all warehouse/distribution centers to operate the cleanest vehicles available;
- Conduct periodic community meetings inviting neighbors, community groups, and other organizations;

AQMD PERMIT REQUIREMENTS

8. In the Draft Recirculated MND, the lead agency describes potential aggregate rock crushing operations that might require AQMD permits. The lead agency should be aware that aggregate rock crushing operations or equipment including emergency diesel-powered generators are subject to the following rules and should note this in the Final CEQA document. In addition, the rock crushing and hauling emissions from this site preparation activity should be included in the Final CEQA document as a worst case scenario estimate for construction. If emergency generators are proposed, those emissions should also be calculated and included in the Final CEQA document. Permit questions can be directed to AQMD engineering and compliance staff at (909) 396-2591.
 - Rule 1157 - PM10 Emission Reductions from Aggregate and Related Operations; and
 - Regulation XIII – New Source Review.