



# South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

October 9, 2018

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Attn: Mike Burrows, Executive Director  
San Bernardino International Airport Authority  
1601 E. 3<sup>rd</sup> Street, #100  
San Bernardino, California 92408

## **Draft Environmental Impact Report (DEIR) for the Proposed Eastgate Building 1 Project (SCH: 2018071038)**

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.

### SCAQMD Staff's Summary of Project Description

The lead agency proposes to construct a 658,500 square-foot warehouse, two maintenance and service buildings totaling 50,000 square-feet, and over 2,000 parking spaces for passenger vehicles and truck trailers combined, on a 101.52 acre site. The project is located on the southwest corner of Perimeter Road and Hangar Way within the San Bernardino International Airport in the City of San Bernardino.

### SCAQMD Staff's Summary of Air Quality Analysis

The lead agency has determined that after the implementation of Mitigation Measures 4.2-1 through 4.2-32, the proposed project will have significant and unavoidable impacts to regional air quality during construction and operation. SCAQMD staff has comments regarding the air quality analysis. Additionally, SCAQMD staff has recommendations for further mitigation. See SCAQMD staff's detailed comments below.

### SCAQMD Staff's Comments

#### *Air Quality Analysis - Construction*

There are some discrepancies in the air quality analysis regarding the construction emissions presented in the main body of the draft EIR (Vol. 1) and the Technical Appendices (Vol. 2). For example, in the main body of the draft EIR, Table 4.2-8 *Emissions Summary of Construction With Mitigation* implies that PM10 and PM2.5 have been mitigated to 214.71 and 56.35 pounds per day, respectively.<sup>1</sup> However, based on the Technical Appendices, Table 3-5 *Emissions Summary of Construction (With Mitigation)* it appears that PM10 and PM2.5 have only been mitigated to 514 and 130.91 pounds per day, respectively.<sup>2</sup> Such discrepancies make it hard to follow the lead agency's significance finding and identify how the proposed mitigation measures will reduce significant regional construction emissions from NOx, PM10, and PM2.5. Therefore, SCAQMD staff recommends the lead agency revise the air quality analysis to provide a clear understanding of the significant air quality impacts to regional air quality during construction and the mitigation measures that will be implemented to reduce these impacts.

#### *Air Quality Analysis - Operation*

The lead agency should include interim milestone years in the operational air quality analysis. The lead agency included two years for analysis: the baseline operation year of 2017 and the peak operation year

<sup>1</sup> Draft EIR (Vol. 1), pages 4-20 – 4-21.

<sup>2</sup> Technical Appendices (Vol. 2), page 36.

2024.<sup>3</sup> Although the project may not reach its complete capacity before 2024, it is possible that, due to higher emissions rates from mobile sources in the earlier years of operation, that peak daily emissions may occur before 2024. Therefore, SCAQMD staff recommends that the lead agency include 2019 operational data in the main body of the DEIR in order to demonstrate that 2024 is the peak year. If the lead agency finds that 2024 is not the peak year, this information should be included in the final CEQA document.

#### *Additional Recommended Mitigation Measures*

As described in the SCAQMD's 2016 Air Quality Management Plan, achieving NO<sub>x</sub> and VOC emissions reductions in a timely manner is critical in order to meet attainment of the National Ambient Air Quality Standard (NAAQS) for ozone levels before the 2023 and 2031 deadlines.<sup>4</sup> Additionally, achieving PM<sub>2.5</sub> emissions reductions is critical in order to meet attainment of the NAAQS for PM<sub>2.5</sub> levels before the 2019 and 2024 deadlines.<sup>5</sup> The proposed project contributes to significant regional NO<sub>x</sub>, VOC, and PM<sub>10</sub> and PM<sub>2.5</sub> emissions. Therefore, SCAQMD staff recommends that the lead agency review and incorporate the following mitigation measures to further reduce operational emissions.

#### Construction Equipment

- Require the use of construction equipment that can operate on alternative fuel or electric battery-power, if commercially available.

#### Aircraft and Ground Service Equipment (GSE) Emissions

- Encourage and incentivize aircraft operators to route the cleanest aircraft engines to serve the South Coast Air Basin.
- Consider operational improvements to reduce taxi time and auxiliary power unit usage, where feasible. Additionally, consider single engine taxing, if feasible and as allowed per Federal Aviation Administration guidelines.
- Set goals to achieve a reduction in emissions from aircraft operations over the lifetime of the proposed project.
- Require the use of GSE that can operate on electric battery-power. If electric equipment cannot be obtained, require the use of alternative fuel, the cleanest gasoline equipment, or Tier 4, at a minimum.

#### Diesel Truck Emissions

- Require zero-emissions or near-zero emission trucks, if and when feasible; at a minimum, require that the operator commit to utilizing 2010 model year trucks.
- Require trucks to use the truck route that was analyzed in the Health Risk Assessment of the draft EIR; have truck routes clearly marked with trailblazer signs, so that trucks will not enter residential areas.
- Limit the daily number of trucks allowed at the project to the levels that were analyzed in the draft EIR. If higher daily truck volumes are anticipated at the site, the lead agency should commit to re-evaluating the project's air quality impacts through CEQA prior to allowing higher activity levels.

#### Transportation and Parking

- Provide incentives for employees in order to encourage the use of public transportation or carpooling, such as discounted transit passes or carpool rebates.

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<sup>3</sup> DEIR (Vol. 1), page 4-32.

<sup>4</sup> South Coast Air Quality Management district. March 3, 2017. 2016 Air Quality Management Plan. Accessed at: <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan>.

<sup>5</sup> *Ibid.*

- Implement a rideshare program for employees and set a goal to achieve a certain participation rate over a period of time.
- Provide a parking system that allows for quick entry and exit in order to reduce vehicle idling time. A system should also be installed that provides sufficient signage or communication for available parking. A real time information system on parking availability in the parking lot can minimize the amount of time it takes to find available parking.

Other Mitigation Measures

- Require the use of electric landscaping equipment, such as lawn mowers and leaf blowers.
- Require the use of electric or alternatively fueled sweepers with HEPA filters.
- Maximize the planting of trees in landscaping and parking lots.

SCAQMD Permits

In the event that the proposed project requires a permit from SCAQMD, SCAQMD should be identified as a responsible agency for the Proposed Project. For more information on permits, please visit SCAQMD webpage at: <http://www.aqmd.gov/home/permits>. Questions on permits can be directed to SCAQMD's Engineering and Permitting staff at (909) 396-3385.

Closing

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), SCAQMD staff requests that the Lead Agency provide SCAQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, issues raised in the comments should be addressed in detail 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 will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful or useful to decision makers and the public who are interested in the Proposed Project.

SCAQMD staff is available to work with the lead agency to address any air quality questions that may arise from this comment letter. Please contact Alina Mullins, Assistant Air Quality Specialist, at [amullins@aqmd.gov](mailto:amullins@aqmd.gov) or (909) 396-2402, should you have any questions.

Sincerely,

*Daniel Garcia*

Daniel Garcia

Program Supervisor

Planning, Rule Development & Area Sources

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