



South Coast Air Quality Management District

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Draft Environmental Impact Report (Draft EIR) for the Proposed Banning Distribution Center (SCH: 2018011032)

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 EIR.

SCAQMD Staff's Summary of Project Description

The lead agency proposes construction and operation of an approximately 1,000,000 square-foot (sf) high-cube, non-refrigerated warehouse building, on nearly 63.9 acres (proposed project).¹ The proposed project is located north of the Banning Municipal Airport, and south of the Interstate 10 (I-10) Freeway and the Union Pacific Railroad line in the City of Banning. Construction of the proposed project is expected to begin in January of 2019 and will continue for about 16 months.²

SCAQMD Staff's Summary of Air Quality Analysis

Based on the air quality analysis, the lead agency determined that the proposed project would result in significant air quality impacts during operation, exceeding SCAQMD's CEQA regional air quality significance thresholds for NO_x. Therefore, SCAQMD staff recommends the lead agency include additional mitigation measures in the final EIR to reduce the project's operational emissions. Details regarding this recommendation are available below.

General Comments

The lead agency quantified the proposed project's regional and localized operational emissions based on high-cube non-refrigerated warehouse/distribution building uses. However, given that the future tenants of the warehouse are undetermined at this time and that the Draft EIR includes mitigation measures for transportation refrigeration units (TRUs), it is reasonably foreseeable that the proposed project could be used as a cold storage facility. Therefore, SCAQMD staff recommends that the lead agency disclose potential operational emissions from NO_x and diesel particulate matter from TRUs in the final EIR, unless the lead agency expressly restricts the use of the proposed project to a non-cold storage warehouse.

Further, based on a review of the aerial map in Figure 1-2 of the Draft EIR it appears that a railroad is adjacent to the proposed project site. However, based on the project description in the Draft EIR, it is unclear if the operational phase of the proposed project would result in additional rail activity. In the event that rail activities to deliver and/or transport goods for the proposed project is reasonably foreseeable, the lead agency should evaluate the potential air quality impacts from the uses (e.g., use of locomotive engines) in the final EIR.

¹ Draft EIR. Section 1.4.2, *Executive Summary*, Page 1-13

² Draft EIR. Section 4.2.7, *Air Quality*, Table 4.2-F

Mitigation Measures

SCAQMD staff recommends that the lead agency include the mitigation measures listed below in the final EIR to further reduce the proposed project's significant regional NOx emissions during operation.

- 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 proposed project to levels analyzed in the CEQA document. If higher daily truck volumes are anticipated to visit the site, the lead agency should commit to re-evaluating the proposed project through CEQA prior to allowing this land use or higher activity level.
- Provide electric vehicle (EV) Charging Stations (see the discussion below regarding EV charging stations).
- 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 any significant adverse air quality impacts. SCAQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the lead agency.
- 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 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS)³. 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, SCAQMD staff recommends the lead agency require the proposed project 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, SCAQMD staff recommends that the lead agency require at least 5% of all vehicle parking spaces (including for trucks) include EV charging stations. 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 be appropriately sized to allow for future expanded use.
- Design the industrial building such that entrances and exits are such that trucks are not traversing past neighbors or other sensitive receptors.
- Design the industrial building such that any check-in point for trucks is well inside the proposed project site to ensure that there are no trucks queuing outside of the facility.
- Design the industrial building to ensure that truck traffic within the proposed project site is located away from the property line(s) closest to its residential or sensitive receptor neighbors.

- Restrict overnight parking in residential areas.
- Establish overnight parking within the industrial building where trucks can rest overnight.
- Establish area(s) within the proposed project site for repair needs.
- Develop, adopt and enforce truck routes both in and out of city, and in and out of facilities.
- Create a buffer zone of at least 300 meters (roughly 1,000 feet), which can be office space, employee parking, greenbelt, etc. between the proposed project and sensitive receptors.
- Limit delivery vehicles' idling time to no more than five minutes. For any delivery vehicle that is expected to take longer than five minutes, the vehicle's operator shall be required to shut off the engine. Notify the vendors of these idling requirements at the time that the delivery purchase order is issued and again when vehicles enter the gates of the facility. To further ensure that drivers understand the vehicle idling requirement, post signs at the facility's entry gates stating that idling longer than five minutes is not permitted.
- 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.
- Limit parking supply and unbundle parking costs for employees.
- Maximize the planting of trees in landscaping and parking lots.
- Use light colored paving and roofing materials.
- Install light colored "cool" roofs and cool pavements.
- Require use of electric or alternatively fueled sweepers with HEPA filters.

If no additional feasible mitigation measures or project design features exist that would reduce regional NOx emissions to less than significant levels, the lead agency, pursuant to CEQA Guidelines 15093, is to adopt a statement of overriding considerations that fully address, using substantial evidence to support a determination.

SCAQMD Permits

If any subsequent development or activities implemented under the proposed project require a permit from SCAQMD, SCAQMD is a Responsible Agency. 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.

Conclusion

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 CEQA document. 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)).

Further, when the lead agency makes the finding that the recommended mitigation measures are not feasible, the lead agency should describe the specific reasons for rejecting them in the final CEQA document (CEQA Guidelines Section 15091).

SCAQMD staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Robert Dalbeck, Assistant Air Quality Specialist - CEQA IGR Section, at rdalbeck@aqmd.gov, if you have any questions regarding these comments.

Sincerely,

Daniel Garcia

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