



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Mitigated Negative Declaration (MND) for the Proposed Baseline and Tamarind Warehouse Project

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 MND.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to construct a 156,500-square-foot warehouse on 8.01 acres (Proposed Project). The Proposed Project is located on the northwest corner of Base Line Road and Tamarind Avenue in the City of Rialto.

SCAQMD Staff's Summary of Air Quality Analysis

In the Air Quality Section, the Lead Agency quantified the Proposed Project's construction and operational emissions and compared those emissions to SCAQMD's recommended regional and localized air quality CEQA significance thresholds. Based on the analyses, the Lead Agency found that the Proposed Project's regional construction air quality impacts would be less than significant. Localized construction and regional operational air quality impacts would also be less than significant, after the incorporation of mitigation measures (MM) AQ-1 and MM AQ-2¹. MM AQ-1 has two options to reduce NOx emissions during operation. Option A limits the number of heavy-duty, diesel-fueled trucks accessing the Proposed Project site to 165 trucks per day, if the truck fleet is older than the 2010 U.S. EPA/CARB truck engine standards. Option B limits the number of heavy-duty, diesel-fueled trucks accessing the Project site to 210 trucks per day, if the truck fleet is wholly or partially older than the 2010 U.S. EPA/CARB truck engine standards². MM AQ-2 requires that during site preparation phase, construction equipment greater than 150 horsepower shall meet EPA/CARB Tier 3 emissions standards³.

SCAQMD's 2016 Air Quality Management Plan

On March 3, 2017, the SCAQMD's Governing Board adopted the 2016 Air Quality Management Plan (2016 AQMP)⁴, which was later approved by the California Air Resources Board on March 23, 2017. Built upon the progress in implementing the 2007 and 2012 AQMPs, the 2016 AQMP provides a regional perspective on air quality and the challenges facing the South Coast Air Basin. The most significant air quality challenge in the Basin is to achieve an additional 45 percent reduction in nitrogen oxide (NOx) emissions in 2023 and an additional 55 percent NOx reduction beyond 2031 levels for ozone attainment.

¹ MND. Chapter 3.3, pages 25-51.

² *Ibid.*

³ *Ibid.* Appendices, Air Quality Impact Analysis, page 5.

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

SCAQMD Staff's General Comments

As described in the 2016 AQMP, achieving NOx emissions reductions in a timely manner is critical to attaining the National Ambient Air Quality Standard (NAAQS) for ozone before the 2023 and 2031 deadlines. SCAQMD is committed to attaining the ozone NAAQS as expeditiously as practicable.

SCAQMD staff has comments on MM AQ-1 and MM AQ-2. While MM AQ-1 discussed the 2010 model year trucks, it was not clear to SCAQMD staff if 2010 model year or newer trucks would be used during operation of the Proposed Project and how the Lead Agency would enforce the use. For example, it was not clear if 165 heavy-duty, diesel-fueled trucks per day allowed under Option A and 210 heavy-duty, diesel-fueled trucks per day allowed under Option B would be required to have a 2010 model year or newer truck engine. Additionally, SCAQMD staff recommends that the Lead Agency revise MM AQ-2 to require the use of Tier 4 construction equipment of 50 horsepower or greater. Please see the attachment for more information.

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 SCAQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, response 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 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 or (909) 396-2402, should you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment

LS:AM

SBC181128-02

Control Number

ATTACHMENT

Recommended Changes to Mitigation Measure (MM) AQ-1 and MM AQ-2:

1. CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse impacts. SCAQMD staff recommends that the Lead Agency incorporate the following changes to MM AQ-1 and MM AQ-2 in the Final MND to further reduce the Proposed Project's construction and operational emissions. For more information on potential mitigation measures as guidance to the Lead Agency, please visit SCAQMD's CEQA Air Quality Handbook website⁵.

MM AQ-1: 2010 Model Year or Newer Truck Engines

MM AQ-1 has two options to reduce NOx emissions during operation. Option A limits the number of heavy-duty, diesel-fueled trucks accessing the Proposed Project site to 165 trucks per day, if the truck fleet is older than the 2010 U.S. EPA/CARB truck engine standards. Implementation of Option A would reduce the Proposed Project's operational NOx emissions to at least 54.45 pounds per day⁶. Option B limits the number of heavy-duty, diesel-fueled trucks accessing the Proposed Project site to 210 trucks per day, if the truck fleet is wholly or partially older than the 2010 U.S. EPA/CARB truck engine standards. Implementation of Option B would reduce the Proposed Project's operational NOx emissions to at least 54.44 pounds per day⁷.

While the Lead Agency discussed the use of 2010 U.S. EPA/CARB truck engine standards in MM AQ-1, it did not require that the Proposed Project commit to using trucks that comply or exceed the 2010 model year truck engine standard. It was also not clear to SCAQMD staff if the numbers of heavy-duty, diesel fueled trucks per day allowed under both Option A and Option B would be 2010 model year or newer trucks. Therefore, SCAQMD staff recommends that the Lead Agency revise MM AQ-2 to require all heavy-duty, diesel-fueled trucks accessing the Proposed Project site meet the 2010 U.S. EPA/CARB truck engine standard⁸. In the event that 2010 model year or newer diesel haul trucks cannot be obtained, provide documentation as information becomes available and use trucks that meet U.S. EPA 2007 model year NOx emissions requirements, at a minimum. Additionally, it is recommended that the Lead Agency develop incentives, phase-in schedules to encourage the use of zero-emissions or near-zero emissions trucks, if and when feasible.

MM AQ-2: Tier 4 Construction Equipment

To further reduce the Proposed Project's regional and localized emissions during construction, SCAQMD staff recommends that the Lead Agency incorporate the following changes to MM AQ-2 in the Final MND.

MM AQ-2 During ~~the site preparation phase,~~ construction, equipment greater than ~~150~~ 50 horsepower (>~~150~~ 50 HP), the Construction Contractor shall use off-road diesel construction equipment that complies or exceeds ~~with~~ EPA/CARB Tier ~~3~~ 4 emissions standards and will ensure that all construction equipment be tuned and maintained in accordance with the manufacturer's

⁵ South Coast Air Quality Management District. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.

⁶ *Ibid.* Page 38.

⁷ *Ibid.* Page 39.

⁸ Based on a review of the California Air Resources Board's diesel truck regulations, 2010 model year diesel haul trucks should have already been available and can be obtained in a successful manner for the project construction California Air Resources Board. March 2016. Available at: <http://www.truckload.org/tca/files/ccLibraryFiles/Filename/00000003422/California-Clean-Truck-and-Trailer-Update.pdf> (See slide #23).

specifications. Include the requirement on construction equipment in the purchase order and/or contract with the Construction Contractor. In the event that construction equipment cannot meet the Tier 4 engine certification, the Construction Contractor must demonstrate through future study with written findings supported by substantial evidence that is approved by the Lead Agency before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, reduction in the number and/or horsepower rating of construction equipment, limiting the number of daily construction haul truck trips to and from the Proposed Project using cleaner vehicle fuel, and/or limiting the number of individual construction project phases occurring simultaneously.

Additional Recommended Mitigation Measures:

2. In addition to the recommended changes to the existing MM AQ-1 and MM AQ-2, SCAQMD staff recommends that the Lead Agency incorporate the following mitigation measures for operational air quality impacts from mobile sources and other area sources in the Final MND.

Mobile Sources

- Require trucks to use the truck route that was analyzed in the Health Risk Assessment of the Final MND.
- Have truck routes clearly marked with trailblazer signs so that trucks will not enter residential areas.
- Limit the daily number of truck trips allowed at the Proposed Project to the level that was analyzed in the Final MND (224 truck trip-ends per day). If higher daily truck volumes are anticipated during operation, the Lead Agency should commit to re-evaluating the Proposed Project's air quality impacts through CEQA prior to allowing higher activity levels.
- Design the Proposed Project such that entrances and exits are such that trucks are not traversing past neighbors or other sensitive receptors.
- Design the Proposed Project 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 Proposed Project 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.
- Provide incentives for employees in order to encourage the use of public transportation or carpooling, such as discounted transit passes or carpool rebates.
- Implement a rideshare program for employees and set a goal to achieve a certain participation rate over a period of time.

Area Sources

Additional mitigation measures for operational air quality impacts from other area sources that the Lead Agency should consider may include the following:

- 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.
- Require the use of electric landscaping equipment, such as lawn mowers and leaf blowers.

- Require use of electric or alternatively fueled sweepers with HEPA filters.
- Maximize the planting of trees in landscaping and parking lots.
- Use light colored paving and roofing materials.
- Utilize only Energy Star heating, cooling, and lighting devices, and appliances.
- Use of water-based or low VOC cleaning products that go beyond the requirements under SCAQMD Rule 1113.

General Comments:

3. Upon review of the main body of the MND and the Technical Appendices, SCAQMD staff found that MM AQ-1 and MM AQ-2 are not consistent. For example, MM AQ-1 in the main body of the MND discussed 2010 model year trucks. However, MM AQ-1 discussed Tier 4 construction equipment in the Technical Appendices. SCAQMD staff recommends that this inconsistency between the two documents be corrected in the Final MND.