

FINAL

Initial Study/Mitigated Negative Declaration and Responses to Comments Baseline and Alder Warehouse Project

Prepared for:

City of Rialto

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JANUARY 2019

**Baseline and Alder Warehouse Project
Final Initial Study/Mitigated Negative Declaration and
Responses to Comments**

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ACRONYMS AND ABBREVIATIONS

Acronym/Abbreviation	Definition
CEQA	California Environmental Quality Act
City	City of Rialto
IS	Initial Study
MND	Mitigated Negative Declaration
SCAQMD	South Coast Air Quality Management District

**Baseline and Alder Warehouse Project
Final Initial Study/Mitigated Negative Declaration and
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Baseline and Alder Warehouse Project Final Initial Study/Mitigated Negative Declaration and Responses to Comments

1 INTRODUCTION

An Initial Study/Mitigated Negative Declaration (IS/MND) was prepared for the proposed Baseline and Alder Warehouse project (project) and made available for public comment for a 20-day public review period from December 21, 2018, through January 9, 2019. In accordance with the California Environmental Quality Act (CEQA) Guidelines, Section 15074(b) (14 CCR 15074(b)), before approving the proposed project, the City of Rialto (City), as the lead agency under CEQA, will consider the IS/MND with any comments received during this public review period. Specifically, Section 15074(b) of the CEQA Guidelines (14 CCR 15074(b)) states the following:

Prior to approving a project, the decision-making body of the lead agency shall consider the proposed negative declaration or mitigated negative declaration together with any comments received during the public review process. The decision-making body shall adopt the proposed negative declaration or mitigated negative declaration only if it finds on the basis of the whole record before it (including the initial study and any comments received), that there is no substantial evidence that the project will have a significant effect on the environment and that the negative declaration or mitigated negative declaration reflects the lead agency's independent judgment and analysis.

The agencies and individuals who provided substantive written comments on the environmental issues addressed in the Draft IS/MND are listed in Table 1. Although CEQA (California Public Resources Code, Section 21000 et seq.) and the CEQA Guidelines (14 CCR 15000 et seq.) do not explicitly require a lead agency to provide written responses to comments received on an IS/MND, the lead agency may do so voluntarily. Individual comments within each communication are numbered so comments can be cross-referenced with responses. Comment letters received during the public review period are included in Appendix A.

**Table 1
Comment Letter Summary**

Letter Number	Commenter	Date
1	Lijin Sun, J.D.; Program Supervisor, South Coast Air Quality Management District (SCAQMD)	January 8, 2018

Responses to comments are made in the following text to supplement, clarify, or expand on information already presented in the Draft IS/MND. These responses do not change the significance

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determinations made or the severity of potential environmental impacts evaluated in the Draft IS/MND. Section 15073.5(c)(4) of the CEQA Guidelines (14 CCR 15073.5(c)(4)) permits the inclusion of new information within an IS/MND if the additional information “merely clarifies, amplifies, or makes insignificant modifications to the negative declaration.”

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2 RESPONSES TO COMMENTS

Comment Letter 1: Lijin Sun, J.D.; Program Supervisor, SCAQMD

Comment 1-1

Comment

The comment states the following:

In the Air Quality Analysis 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 and cumulatively considerable effects 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-2. 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 164 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 standards. MM-AQ-2 requires that during site preparation phase, construction equipment greater than 150 horsepower shall meet EPA/CARB Tier 3 emissions standards.

Response

The City concurs with this suggested clarification to MM-AQ-1. Please refer to Section 3, Errata, of this document, for the revised MM-AQ-1.

Comment 1-2

Comment

The comment states the following:

On March 3, 2017, the SCAQMD's Governing Board adopted the 2016 Air Quality Management Plan (2016 AQMP), which was later approved by the California Air Resources Board on March 23, 2017. Built upon the progress in implementing the 2007

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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 (NO_x) emissions in 2023 and an additional 55 percent NO_x reduction beyond 2031 levels for ozone attainment.

Response

This comment is noted. However, since the comment does not specifically address the impact analysis presented in the Draft IS/MND, no further response is needed.

Comment 1-3

Comment

The comment states the following:

As described in the 2016 AQMP, achieving NO_x 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 is concerned about the cumulative air quality impacts analysis in the MND and has comments on MM-AQ-1 and MM-AQ-2. The Proposed Project would be developed in close proximity to several warehouses that are currently being proposed by the Lead Agency with overlapping construction and operational schedules. Additionally, 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 164 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.

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Response

Refer to response to Comment 1-1, above with respect to MM AQ-1. As discussed in the Draft IS/MND and the Air Quality Impact Analysis (Appendix A of the Draft IS/MND), with the incorporation of MM-AQ-2, which requires the use of Tier 3 construction equipment for any piece of equipment over 150 horsepower, construction-related impacts associated with localized air emissions would be reduced to a level of less than significant. As such, the use of Tier 4 construction equipment is not required to reduce impacts.

Comment 1-4

Comment

The comment states the following:

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.

Response

This comment is noted. The City will provide SCAQMD with a copy of this document prior to the public hearing where the City will considered approval of the project and adoption of the IS/MND. The response to comments provided herein includes sufficient details and is provided to SCAQMD and the public in good faith. The City appreciates SCAQMD's offer to work with the City should air quality-related questions arise.

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Comment 1-5

Comment

The comment states the following:

The Lead Agency found that the Proposed Project would not have cumulatively considerable environmental effects; however, SCAQMD staff is concerned that the discussion on the cumulative air quality impacts was not adequate because the air quality and health risks impacts of the Proposed Project were not evaluated in connection with the effects of probable future warehouse projects (CEQA Guidelines 15065(a)(3)). Based on a review of the CEQA documents for warehouse projects prepared by the Lead Agency that the SCAQMD received during the months of November and December 2018, SCAQMD staff found that the Proposed Project would be built next to three probable future warehouses (Table 1: List of Probable Future Warehouses In the Vicinity of the Proposed Project and Figure 1: Probable Future Warehouses In the Vicinity of the Proposed Project). In the MND, the Lead Agency found that the Proposed Project would not have any significant, adverse cumulative air quality impacts based on the finding that the Proposed Project's project-level regional air quality impacts were less than significant. However, according to Table 1, the Proposed Project's construction and operational activities would overlap with the construction and operational activities of the other three warehouse projects located in the vicinity of the Proposed Project (e.g., within 1,000 feet). As such, the Proposed Project's regional and localized criteria pollutants emissions, as well as health impacts, from heavy-duty, diesel-fueled haul truck trips may have been individually limited, but cumulatively considerable. Additionally, as shown in Figure 1, existing sensitive receptors (e.g., residential uses) are located along West Baseline Road and Palmetto Avenue. Therefore, SCAQMD staff recommends that the Lead Agency revise the air quality analysis to include a meaningful evaluation of the Proposed Project's cumulative air quality and health risks impacts. This facilitates the purpose and goal of CEQA on public disclosure and are useful to decision makers and the public who are interested in the Proposed Project. In the event that the Lead Agency finds that the Proposed Project's effects on air quality would be cumulatively significant, mitigation measures will be required to reduce the effects to less than significant pursuant to CEQA Guidelines Sections 15070 and 15071(e).

(this comment also includes a table (identified as Table 1 by SCAQMD) and a figure (identified as Figure 1 by SCAQMD). Please refer to the attached comment letter for the table and figure)

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Response

The Draft IS/MND and the Air Quality Impact Analysis (Appendix A of the Draft IS/MND) acknowledged that Related projects could contribute to an existing or projected air quality exceedance because the Basin is currently nonattainment for ozone, PM₁₀, and PM_{2.5}.

The Draft IS/MND's air quality analysis relies on the SCAQMD guidance for determining cumulative impacts. The SCAQMD has recognized that there is typically insufficient information to quantitatively evaluate the cumulative contributions of multiple projects because each project applicant has no control over nearby projects. The SCAQMD published a report on how to address cumulative impacts from air pollution: *White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution* (Goss & Kroeger, 2003). In this report the AQMD clearly states (Page D-3):

...the AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR. The only case where the significance thresholds for project specific and cumulative impacts differ is the Hazard Index (HI) significance threshold for toxic air contaminant (TAC) emissions. The project specific (project increment) significance threshold is HI > 1.0 while the cumulative (facility-wide) is HI > 3.0. It should be noted that the HI is only one of three TAC emission significance thresholds considered (when applicable) in a CEQA analysis. The other two are the maximum individual cancer risk (MICR) and the cancer burden, both of which use the same significance thresholds (MICR of 10 in 1 million and cancer burden of 0.5) for project specific and cumulative impacts.

Projects that exceed the project-specific significance thresholds are considered by the SCAQMD to be cumulatively considerable. This is the reason project-specific and cumulative significance thresholds are the same. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant.

Therefore, the analysis presented in Draft IS/MND and the Air Quality Impact Analysis assumes that individual projects that do not generate operational or construction emissions that exceed the SCAQMD's recommended daily thresholds for project-specific impacts would also not cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment, and, therefore, would not be considered to have a significant, adverse air quality impact. Alternatively, individual project-related construction and operational emissions that exceed SCAQMD thresholds for project-specific impacts would be considered cumulatively considerable. As previously noted, the Project will not exceed the applicable SCAQMD regional

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threshold for construction and operational-source emissions. As such, the Project will not result in a cumulatively significant impact for construction or operational activity.

Furthermore, in regards to cumulative construction emissions, future projects would be subject to CEQA and would require air quality analysis and, where necessary, mitigation if the Project would exceed SCAQMD thresholds. Criteria air pollutant emissions associated with construction activity of future proposed projects would be reduced through implementation of control measures required by the SCAQMD. Cumulative PM₁₀ emissions would be reduced because all future proposed projects would be subject to SCAQMDs Rule 403 (Fugitive Dust), which sets forth general and specific requirements for all construction sites in the SCAQMD.

Comment 1-6

Comment

The comment states the following:

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, particularly from NO_x. For more information on potential mitigation measures as guidance to the Lead Agency, please visit SCAQMD's CEQA Air Quality Handbook website.

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

MM-AQ-1 has two options to reduce NO_x emissions during operation. Option A limits the number of heavy-duty, diesel-fueled trucks accessing the Proposed Project site to 164 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 NO_x emissions to at least 54.44 pounds per day.

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 NO_x emissions to at least 54.84 pounds per day.

While the Lead Agency discussed the use of 2010 U.S. EPA/CARB truck engine standards in MM- AQ-1, it was not clear to SCAQMD staff if the Lead Agency is committed to using trucks that comply or exceed the 2010 model year truck engine standard under either

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Option A or B. For example, it was not clear to SCAQMD staff if 164 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, neither options included any additional information on the mechanisms that the Lead Agency would implement to enforce the use of 2010 heavy-duty, diesel-fueled trucks during operation. Therefore, SCAQMD staff recommends that at a minimum, the Lead Agency clarify in the Final MND if the number of trucks allowed under Option A or Option B would be 2010 model year trucks.

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. To further reduce the NO_x emissions during operation, SCAQMD staff recommends that the Lead Agency revise MM-AQ-1 to require that all heavy-duty, diesel-fueled trucks accessing the Proposed Project site must meet or exceed the 2010 U.S. EPA/CARB truck engine standard. Additionally, it is recommended that the Lead Agency develop incentives and phase-in schedules to encourage the use of zero-emissions or near-zero emissions trucks, if and when feasible. If the Lead Agency finds that 2010 model year or newer diesel haul trucks are not feasible, the Lead Agency should disclose the finding supported by a good faith, reasoned analysis in the Final MND with factual information as substantial evidence, rather than conclusory statements, in the record. Specifically, the Public Resources Code Section 21061.1 defines feasibility to mean “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors” (CEQA Guidelines Section 15364). The feasibility analysis should, at a minimum, include a discussion on these factors

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 standard. 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 NO_x 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.

Baseline and Alder Warehouse Project

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Response

Refer to response to Comment 1-1, above.

Comment 1-7

Comment

The comment states the following:

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 specifications. To ensure that Tier 4 construction equipment or better will be used during the Proposed Project construction, SCAQMD staff recommends that the Lead Agency include this requirement in applicable bid documents, purchase orders, and contracts. Successful contractor(s) must demonstrate the ability to supply the compliant construction equipment for use prior to any ground disturbing and construction activities. A copy of each unit's certified tier specification or model year specification and CARB or SCAQMD operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment. Additionally, the Lead Agency should require periodic reporting and provision of written construction documents by construction contractor(s) to ensure compliance, and conduct regular inspections to the maximum extent feasible to ensure compliance. 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 Tier 3 emissions standards compliant construction equipment and/or 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,

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and/or limiting the number of individual construction project phases occurring simultaneously.

Response

As discussed in the Draft IS/MND and the Air Quality Impact Analysis (Appendix A of the Draft IS/MND), with the incorporation of MM-AQ-2, which requires the use of Tier 3 construction equipment for any piece of equipment over 150 horsepower, construction-related impacts associated with localized air emissions would be reduced to a level of less than significant. As such, the use of Tier 4 construction equipment is not required to reduce impacts.

Comment 1-8

Comment

The comment states the following:

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.

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- 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.

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Response

As discussed in the Draft IS/MND and the Air Quality Impact Analysis (Appendix A of the Draft IS/MND), with the incorporation of MM-AQ-1 and MM-AQ-2, impacts related to air quality would be reduced to a level of less than significant. As such, no further mitigation measures are required to reduce impacts. Notwithstanding, several of these additional recommended mitigation measures will still be adhered to, either because they have already been incorporated as project design features or are required pursuant to state and/or local building codes.

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3 ERRATA

The following provides minor revisions, corrections, and additions to the Draft IS/MND. The corrections and additions are organized by section and page number of the Draft IS/MND. New text additions are shown in underline format, and deletions are shown in ~~strikeout~~ format.

Section 3.3, Air Quality

Page 39

MM-AQ-1 has been revised pursuant to a clarification recommended by SCAQMD:

MM-AQ-1 In order to reduce the operational impacts associated with oxides of nitrogen (NO_x) emissions, the proposed project shall implement one of the following mitigation options:

Mitigation Option A: The proposed project's tenant(s) shall limit the number of heavy-duty diesel-fueled trucks accessing the project site to 164 trucks per day if ~~the truck fleet is wholly or partially~~ any of the trucks accessing the site are older than the 2010 U.S. Environmental Protection Agency/California Air Resources Board (EPA/CARB) truck engine standards. The tenant shall keep a truck log tracking on-site trucking activities and shall make it available to the City of Rialto and/or their designee at the City's request.

or

Mitigation Option B: The proposed project's tenant(s) shall limit the number of heavy-duty diesel-fueled trucks accessing the project site to 210 trucks per day if all of the truck fleet is equal to or better than the 2010 U.S. Environmental Protection Agency/California Air Resources Board truck engine standards. The tenant shall keep a truck log tracking on-site trucking activities and make it available to the City of Rialto and/or their designee at the City's request.

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APPENDIX A

Comment Letters



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL AND USPS:

January 8, 2019

drosas@rialto.ca.gov

Daniel Rosas, Assistant Planner
City of Rialto, Development Services Department
Planning Division
150 South Palm Avenue
Rialto, California 92376

Mitigated Negative Declaration (MND) for the Proposed Alder - Baseline Road 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 255,173-square-foot warehouse on 11.63 acres (Proposed Project). The Proposed Project is located on the northwest corner of Alder Avenue and Base Line Road in the City of Rialto.

SCAQMD Staff's Summary of Air Quality Analysis

In the Air Quality Analysis 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 and cumulatively considerable effects 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 164 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.

1-1

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.

1-2

¹ MND. Pages 45-52.

² *Ibid.*

³ *Ibid.*

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 is concerned about the cumulative air quality impacts analysis in the MND and has comments on MM-AQ-1 and MM-AQ-2. The Proposed Project would be developed in close proximity to several warehouses that are currently being proposed by the Lead Agency with overlapping construction and operational schedules. Additionally, 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 164 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.

1-3

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.

1-4

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

SBC181221-06

Control Number

ATTACHMENT

Cumulative Air Quality Impacts Analysis

1. The Lead Agency found that the Proposed Project would not have cumulatively considerable environmental effects⁵; however, SCAQMD staff is concerned that the discussion on the cumulative air quality impacts was not adequate because the air quality and health risks impacts of the Proposed Project were not evaluated in connection with the effects of probable future warehouse projects (CEQA Guidelines 15065(a)(3)). Based on a review of the CEQA documents for warehouse projects prepared by the Lead Agency that the SCAQMD received during the months of November and December 2018, SCAQMD staff found that the Proposed Project would be built next to three probable future warehouses⁶ (Table 1: *List of Probable Future Warehouses In the Vicinity of the Proposed Project* and Figure 1: *Probable Future Warehouses In the Vicinity of the Proposed Project*). In the MND, the Lead Agency found that the Proposed Project would not have any significant, adverse cumulative air quality impacts based on the finding that the Proposed Project's project-level regional air quality impacts were less than significant. However, according to Table 1, the Proposed Project's construction and operational activities would overlap with the construction and operational activities of the other three warehouse projects located in the vicinity of the Proposed Project (e.g., within 1,000 feet). As such, the Proposed Project's regional and localized criteria pollutants emissions, as well as health impacts, from heavy-duty, diesel-fueled haul truck trips may have been individually limited, but cumulatively considerable. Additionally, as shown in Figure 1, existing sensitive receptors (e.g., residential uses) are located along West Baseline Road and Palmetto Avenue. Therefore, SCAQMD staff recommends that the Lead Agency revise the air quality analysis to include a meaningful evaluation of the Proposed Project's cumulative air quality and health risks impacts. This facilitates the purpose and goal of CEQA on public disclosure and are useful to decision makers and the public who are interested in the Proposed Project. In the event that the Lead Agency finds that the Proposed Project's effects on air quality would be cumulatively significant, mitigation measures will be required to reduce the effects to less than significant pursuant to CEQA Guidelines Sections 15070 and 15071(e).

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Table 1: List of Probable Future Warehouses in the Vicinity of the Proposed Project¹

Project Name	Size (sq.ft)	Location ² (from Proposed Project)	Construction Schedule	Operational Schedule	Estimated Number of Truck Trips During Operation ³
Alder – Baseline Road Project (Proposed Project)	255,173	(Proposed Project)	2018 – 2020	2020	364
Alder II Warehouse	78,680	200 feet North	2018 – 2019	2019	121
Baseline and Tamarind Warehouse	156,500	350 feet West	2018 – 2020	2020	224
CDRE Baseline Warehouse	99,999	1,000 feet West	2019 – 2020	2020	143

Source: SCAQMD. January 4, 2019.

Notes: 1. The table was generated by SCAQMD staff based on the information from the MND for the Alder – Baseline Road Project, the MND for the Alder II Warehouse, the MND for CDRE Baseline Warehouse, and the MND Baseline and Tamarind Warehouse. 2. The location is based on a review of aerial photographs by SCAQMD staff. 3. Estimated number of truck trips was cited from the CEQA documents for the warehouse projects.

⁵ MND. Pages 46-47.

⁶ SCAQMD staff has received three other CEQA documents for the following projects: Alder II Warehouse Project, Baseline and Tamarind Warehouse, and CDRE Baseline Warehouse.

Figure 1: Probable Future Warehouses In the Vicinity of the Proposed Project

Source: SCAQMD. January 4, 2019.

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

2. 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, particularly from NOx. For more information on potential mitigation measures as guidance to the Lead Agency, please visit SCAQMD's CEQA Air Quality Handbook website⁷.

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 164 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 54.44 pounds per day⁸.

⁷ South Coast Air Quality Management District. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.

⁸ MND. Page 44.

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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 54.84 pounds per day⁹.

While the Lead Agency discussed the use of 2010 U.S. EPA/CARB truck engine standards in MM-AQ-1, it was not clear to SCAQMD staff if the Lead Agency is committed to using trucks that comply or exceed the 2010 model year truck engine standard under either Option A or B. For example, it was not clear to SCAQMD staff if 164 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, neither options included any additional information on the mechanisms that the Lead Agency would implement to enforce the use of 2010 heavy-duty, diesel-fueled trucks during operation. Therefore, SCAQMD staff recommends that at a minimum, the Lead Agency clarify in the Final MND if the number of trucks allowed under Option A or Option B would be 2010 model year trucks.

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. To further reduce the NOx emissions during operation, SCAQMD staff recommends that the Lead Agency revise MM-AQ-1 to require that all heavy-duty, diesel-fueled trucks accessing the Proposed Project site must meet or exceed the 2010 U.S. EPA/CARB truck engine standard¹⁰. Additionally, it is recommended that the Lead Agency develop incentives and phase-in schedules to encourage the use of zero-emissions or near-zero emissions trucks, if and when feasible. If the Lead Agency finds that 2010 model year or newer diesel haul trucks are not feasible, the Lead Agency should disclose the finding supported by a good faith, reasoned analysis in the Final MND with factual information as substantial evidence, rather than conclusory statements, in the record. Specifically, the Public Resources Code Section 21061.1 defines feasibility to mean "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors" (CEQA Guidelines Section 15364). The feasibility analysis should, at a minimum, include a discussion on these factors.

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 specifications. To ensure that Tier 4 construction equipment or better will be used during the Proposed Project construction, SCAQMD staff recommends that the Lead Agency include this requirement in applicable bid documents, purchase orders, and contracts. Successful contractor(s) must demonstrate the ability to supply the compliant construction equipment for use prior to any ground disturbing and construction activities. A copy of each unit's certified tier specification or

⁹ *Ibid.* Page 45.

¹⁰ 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/000000003422/California-Clean-Truck-and-Trailer-Update.pdf> (See slide #23).

model year specification and CARB or SCAQMD operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment. Additionally, the Lead Agency should require periodic reporting and provision of written construction documents by construction contractor(s) to ensure compliance, and conduct regular inspections to the maximum extent feasible to ensure compliance. 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 Tier 3 emissions standards compliant construction equipment and/or 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.

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Recommended New Mitigation Measures:

3. 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 (364 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.

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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.

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