

January 24, 2019

Mr. Daniel Casey  
City of Rialto  
Planning Division  
150 S. Palm Avenue  
Rialto, CA 92376

**SUBJECT: Response to SCAQMD on IS/MND, Alder II Warehouse Project,**

Dear Daniel:

This letter is in response to the City's request for Lilburn Corporation to provide Response to Comments received on the Alder II Warehouse Project. As we discussed, the responses provided herein will provide the City with information to respond to the South Coast Air Quality Management District (SCAQMD) and to have the additional information necessary to proceed with adoption of a Mitigated Negative Declaration based on the Initial Study that was circulated for public review.

On January 8, 2019, the City received a comment letter from SCAQMD on the Initial Study/Mitigated Negative Declaration ("IS/MND") prepared for the Alder II Warehouse located within the Renaissance Specific Plan. The comments in the SCAQMD letter have been numbered to make reviewing the responses to specific comments easier for the reviewer (see attached letter), and the content of the various comments are summarized below.

Comment 1: The Lead Agency found that the Proposed Project would not have cumulatively considerable environmental effects<sup>1</sup>; however, SCAQMD staff is concerned that the discussion on the cumulative 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 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 (SCAQMD Letter: 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 (SCAQMD Letter), 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).

Response 1: City staff concurs that with the other proposed warehouses in the area, as shown in Table 1 of SCAQMD's letter, cumulatively considerable impacts could occur during both construction and operational phases of implementing the warehouses. The Renaissance Specific Plan was proposed and adopted for redevelopment of the Rialto Municipal Airport Specific Plan area. The City's long-term goal was for redevelopment of the area as primarily industrial and warehousing to attract employment opportunity, increase the jobs/housing ratio, and take advantage of the County being once of the largest warehouse and distribution regions in the U.S.

The Draft IS/MND's air quality analysis (CalEEMod Model and Health Risk Assessment) 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 the Draft IS/MND 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 threshold for construction and operational-source emissions. As such, the Project will not result in a cumulatively significant impact for construction or operational activity.

In addition, 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. The development of the proposed project does not exceed SCAQMD daily thresholds. Cumulative PM<sub>10</sub> emissions would be reduced as 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 2: CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse air quality impacts. To further reduce the Proposed Project's regional and localized air quality impacts, particularly impacts from NO<sub>x</sub> emissions, SCAQMD staff recommends that the Lead Agency incorporate the following mitigation measures for mobile sources and other area sources in the Final MND.

#### *Mobile Sources*

Mitigation measures for construction and operational air quality impacts from mobile sources that the Lead Agency should consider may include the following:

- Require the use of construction equipment that can operate on alternative fuel or electric battery-power, if commercially available. At a minimum, require the use of Tier 4 construction equipment.

- 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 during construction and operation.
- Require the use of yard equipment that can operate on alternative fuel or electric battery-power, if commercially available.
- 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 (121 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.

#### *Area Sources*

Additional mitigation measures for operational air quality impacts from 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.

Response 2: Comment noted. The City of Rialto includes numerous measures, as applicable to a project's construction and operation as standard conditions of approval. In addition, approval of the proposed project would be required to comply with applicable mitigation measures outlined within the Renaissance Specific Plan EIR. The Applicant will be requested to consider implementing the measures listed in SCAQMD's letter that are feasible for a warehouse project when submitting final design plans for the City's review and approval.

If you should have any questions or require additional information, please do not hesitate to give us a call.

Sincerely,

Frank Amendola  
Project Manager