



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 Bridge Point North Rialto 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 demolish 1,532 square feet of existing buildings and construct a 382,018-square-foot warehouse on 11.66 acres of a 15.95-acre site (Proposed Project). The Proposed Project is located on the northeast corner of North Locust Avenue and West Norwood Street in the City of Rialto. Upon review of the MND and aerial photographs, SCAQMD staff found that residential units are located within 50 feet of the Proposed Project¹. Construction is expected to last 18 months, beginning in April 2019 with operations beginning in 2020². During operation, the Proposed Project will generate 642 daily trips, 40 percent of which will be truck trips³.

SCAQMD Staff's Summary of Air Quality Analyses

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 and localized construction and operational air quality impacts would be less than significant⁴. The Lead Agency also prepared a mobile source Health Risk Assessment (HRA) and found that the Proposed Project's individual maximum cancer risk would be 4.05 in one million⁵, which would be below SCAQMD's CEQA significance threshold of 10 in one million for cancer risk⁶.

SCAQMD's 2016 Air Quality Management Plan

On March 3, 2017, SCAQMD's Governing Board adopted the 2016 Air Quality Management Plan (2016 AQMP)⁷, which was later approved by the California Air Resources Board (CARB) 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 (Basin). The most

¹ MND. Section IV Environmental Evaluation "3. Air Quality" Page 25.

² MND. Section II Description of Proposed Project "Construction and Phasing" Page 3.

³ MND. Section IV Environmental Evaluation "3. Air Quality" Page 24.

⁴ *Ibid.* Pages 20-29.

⁵ *Ibid.* Page 29.

⁶ SCAQMD has developed the CEQA significance threshold of 10 in one million for cancer risk. When SCAQMD acts as the Lead Agency, SCAQMD staff conducts a HRA, compares the maximum cancer risk to the threshold of 10 in one million to determine the level of significance for health risk impacts, and identifies mitigation measures if the risk is found to be significant.

⁷ 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>.

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.

SCAQMD Staff's General Comments

The Lead Agency found that the Proposed Project's localized construction air quality impacts would result in 6.45 pounds per day (lbs/day) of PM2.5, which is slightly below SCAQMD's Localized Significance Thresholds (LSTs) for the Southwest San Bernardino Valley Source Receptor Area (SRA) of 7 lbs/day⁸. Additionally, the Lead Agency found that the Proposed Project's localized operational air quality impacts would result in 2.56 pounds per day (lbs/day) of PM2.5, which is slightly below SCAQMD's LSTs for the same SRA of 3 lbs/day⁹. To further reduce the Proposed Project's potential localized construction and operational impacts on sensitive receptors who live in close proximity to the Proposed Project from exposures to PM2.5 emissions, SCAQMD staff recommends construction and operational mitigation measures as a resource that the Lead Agency should consider for incorporation into the Final MND. These recommended mitigation measures are also capable of further reducing the Proposed Project's NOx emissions and facilitate the achievement of PM2.5 attainment goals outlined in the 2016 AQMP. NOx emissions can lead to the production of emissions of particulate matter with a diameter of 2.5 micrometers or smaller (PM2.5). Therefore, NOx emissions reductions can lead to significant improvements in PM2.5 and help the Basin achieve the attainment of the annual PM2.5 standard by 2025¹⁰. Additionally, SCAQMD staff has comments regarding the consistency of information presented in the Final MND. 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, informative, or useful to decision makers and the public who are interested in the Proposed Project. Further, if the Lead Agency makes a finding that the additional recommended mitigation measures are not feasible, the Lead Agency should describe the specific reasons for rejecting or substituting these mitigation measures in the Final MND (CEQA Guidelines Section 15074.1). 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

SBC190322-13

Control Number

⁸ MND. Section IV Environmental Evaluation "3. Air Quality" Page 26.

⁹ *Ibid.* Page 27.

¹⁰ *Ibid.*

ATTACHMENT

Additional Recommended Mitigation Measures:

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. To further reduce the Proposed Project's localized construction and operational emissions and potential impacts on sensitive receptors located within 50 feet of the Proposed Project, and to facilitate the achievement of PM_{2.5} attainment goals in the 2016 AQMP, SCAQMD staff recommends that the Lead Agency review and incorporate the following mitigation measures in the Final MND. For more information on potential mitigation measures as guidance to the Lead Agency, please visit SCAQMD's CEQA Air Quality Handbook website¹¹.

Mitigation Measures for Construction Air Quality Impacts from Off-Road Equipment

- Use off-road diesel-powered construction equipment that meets or exceeds the California Air Resources Board (CARB) and U.S. Environmental Protection Agency (USEPA) Tier 4 off-road emissions standards for equipment rated at 50 horsepower or greater during construction. Such equipment should be outfitted with Best Available Control Technology (BACT) devices including CARB certified Level 3 Diesel Particulate Filters (DPF). Level 3 DPFs are capable of achieving at least an 85 percent reduction in particulate matter emissions¹². A list of CARB verified DPFs are available on the CARB website¹³. Additionally, the Lead Agency should include this requirement in applicable bid documents, and that successful contractor(s) must demonstrate the ability to supply such equipment prior to ground disturbing activities. A copy of each unit's certified tier specification and CARB or SCAQMD operating permit (if applicable) should 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 documentation by contractors to ensure compliance, and conduct regular inspections to the maximum extent feasible to ensure compliance. In the event that the Lead Agency finds that Tier 4 construction equipment is not feasible pursuant to CEQA Guidelines Section 15364, the Lead Agency should, at a minimum, specify in the Final MND that using Tier 3 or newer construction equipment is a project requirement that contractor(s) must provide evidence to the Lead Agency for review and approval prior to the commencement of any construction activities.
- Maintain vehicle and equipment maintenance records for the construction portion of the Proposed Project. All construction equipment and vehicles must be tuned and maintained in compliance with the manufacturer's recommended maintenance schedule and specifications. All maintenance records for each vehicle and equipment and their construction contractor(s) should be made available for inspection and remain on-site for a period of at least two years from completion of construction.
- Enter into a contract that notifies all construction vendors and contractors that vehicle idling time will be limited to no longer than five minutes or another time-frame as allowed by the California Code of Regulations, Title 13 section 2485 - CARB's Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling. For any vehicle delivery that is expected to take longer than five minutes, each project applicant, project sponsor, or public agency will require the vehicle's operator to shut off the engine. Notify the vendors of these idling

¹¹ South Coast Air Quality Management District. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.

¹² California Air Resources Board. November 16-17, 2004. *Diesel Off-Road Equipment Measure – Workshop*. Page 17. Accessed at: https://www.arb.ca.gov/msprog/ordiesel/presentations/nov16-04_workshop.pdf.

¹³ *Ibid*. Page 18.

requirements at the time that the purchase order is issued and again when vehicles enter the gates of the facility. To further ensure that drivers and operators understand the idling requirement, post signs at the entry of the construction site and throughout the Proposed Project site stating that idling longer than five minutes is not permitted.

- Encourage construction contractors to apply for SCAQMD “SOON” funds. The “SOON” program provides funds to applicable fleets for the purchase of commercially-available low-emission heavy-duty engines to achieve near-term reduction of NOx emissions from in-use off-road diesel vehicles. More information on this program can be found at SCAQMD’s website: <http://www.aqmd.gov/home/programs/business/business-detail?title=off-road-diesel-engines>.

Mitigation Measures for Operational Air Quality Impacts from Mobile Sources

- Require the use of zero-emission or near-zero emission heavy-duty trucks during operation, such as trucks with natural gas engines that meet CARB’s adopted optional NOx emissions standard of 0.02 grams per brake horsepower-hour (g/bhp-hr). At a minimum, require that operators of heavy-duty trucks visiting the Proposed Project during operation commit to using 2010 model year or newer engines that meet CARB’s 2010 engine emission standards of 0.01 g/bhp-hr for particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks. Include analyses to evaluate and identify sufficient power available for zero emission trucks and supportive infrastructures in the Energy and Utilities and Service Systems Sections of the Final MND, where appropriate. The Lead Agency should include the requirement of zero-emission or near-zero emission heavy-duty trucks in applicable bid documents, purchase orders, and contracts. Operators shall maintain records of all trucks associated with project construction to document that each truck used meets these emission standards, and make the records available for inspection. The Lead Agency should conduct regular inspections to the maximum extent feasible to ensure compliance.
- Provide electric vehicle (EV) charging stations. Require at least 5% of all vehicle parking spaces include EV charging stations, or at a minimum, require the Proposed Project to be constructed with the appropriate infrastructure to facilitate sufficient electric charging for trucks to plug-in. Electrical hookups should be provided at the onsite truck stop for truckers to plug in any onboard auxiliary equipment. Electrical panels should be appropriately sized to allow for future expanded use. The Lead Agency should also include analyses to evaluate and identify sufficient power available for zero emission trucks and supportive infrastructures (e.g., EV charging stations) in the Energy and Utilities and Service Systems Sections of the Final MND, where appropriate.
- Require trucks to the truck route that was analyzed in the Health Risk Assessment of the Final MND.
- Limit the daily number of truck trips allowed at the Proposed Project to the level that was analyzed in the Final MND (e.g., 40% of 642 daily trips as truck trips). 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.
- The Proposed Project is currently designed such that the truck entrance and exit is located in an area of the site furthest away from sensitive receptors. The Lead Agency should have truck routes clearly marked with trailblazer signs such that trucks are not traversing past neighbors or

other sensitive receptors and will be lead directly to the truck access driveway¹⁴, preventing trucks from entering residential areas.

- 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 and away from residential or sensitive receptors to the maximum extent that is feasible and practicable.
- 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 the City, and in and out of facilities.
- 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.

Mitigation Measures for Operational Air Quality Impacts from Area Sources

- Maximize the 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.

Other Comment

2. Upon review of the main body of the MND and Technical Appendices, SCAQMD staff found an inconsistency. In both the main body of the MND and Technical Appendices, the Lead Agency found that the highest calculated carcinogenic risk is 4.05 per million for a 70-year exposure, 3.41 per million for 30-year exposure, and 2.45 per million for 9-year exposure and referenced the risk assessment results in Tables 8¹⁵ and 2¹⁶, respectively. However, Table 8 in the main body of the MND is an exact copy of Table 7: *Localized Significance of Operational Emissions (Maximum Pounds Per Day)* and does not show the calculated carcinogenic risk. In the Technical Appendices, Table 2: *Risk Assessment Results* shows that the Maximum Cancer Risk is 6.20 per million for a 70-year exposure,

¹⁴ MND. Section IV Environmental Evaluation “10. Land Use and Planning” Page 72.

¹⁵ MND. Section IV Environmental Evaluation “3. Air Quality” Page 24.

¹⁶ MND. Appendix A: Air Quality Assessment, Greenhouse Gas Emissions Assessment, and Health Risk Assessment “Health Risk Assessment for the proposed Bridge Point North Rialto Project in the City of Rialto, California”. Pages 19-20.

5.22 per million for a 30-year exposure, and 3.75 for a 9-year exposure, which are not consistent with the information presented in the both the main body of the MND and the Technical Appendices. Further, the Health Risk Calculation worksheet in the Technical Appendices showed that the Maximum Cancer Risk is 6.20, 5.22, and 3.75 per million based on a 70-, 30-, and 9-year exposure period, respectively¹⁷. Due to these inconsistencies, SCAQMD staff found that the Proposed Project's HRA analysis and findings were difficult to follow and understand. To promote informational clarity and facilitate a meaningful public review of the Lead Agency's finding of the carcinogenic risks associated with the operation of the Proposed Project, SCAQMD staff recommends that the Lead Agency correct these inconsistencies in the Final MND and technical appendices, where applicable.

¹⁷ *Ibid.* Page 346.