



# South Coast Air Quality Management District

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SENT VIA USPS AND E-MAIL:

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## **Mitigated Negative Declaration (MND) for the Proposed Design Review DRC2016-00670, Specific Plan Amendment DRC2016-00931**

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 MND.

### Project Description

The Lead Agency proposes to construct and operate a 232,058-square-foot, high-cube warehouse with unknown occupants on an approximately 11.84-acre site ("project"). The project is bounded by commercial uses to the north and east, residential dwellings to the south, and a vacant commercial lot to the west. The residential dwellings are within ¼ mile of the project.

### Air Quality and Health Risk Assessment (HRA) Analyses

The MND estimates approximately 396 total vehicle trips, including approximately 151 daily diesel truck trips. In the Air Quality Section, the Lead Agency quantified the proposed project's construction and operation air quality impacts and compared those impacts with SCAQMD's regional and localized air quality CEQA significance thresholds. The Lead Agency found that regional and localized construction and operational emissions would be less than significant. Additionally, the Lead Agency performed an HRA and found that "all offsite diesel emissions concentrations were [...] below the 10.0 in a million cancer risk threshold [...] for all age groups examined" (see Page Rev 3-1-16 of the MND).

SCAQMD staff has concerns about the health risk analysis in the MND. The HRA analysis performed for this project was based on improper assumptions which has likely underestimated the project's health risk impacts. Additionally, SCAQMD staff finds that the MND is not clear with respect to meteorological data that was used in the air quality analysis. Details are included in the attachment. The attachment also includes a list of recommended mitigation measures which the Lead Agency should implement and include in the Final MND, if the revised health risks from the project are found to be significant.

Pursuant to the CEQA Guidelines Section 15074, prior to approving the project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process. Please provide SCAQMD staff with written responses to all comments contained herein prior to the adoption of the Final MND. SCAQMD staff is available to work with the Lead Agency to address the issues raised in the letter and any other air quality and HRA

questions that may arise. Please contact Jack Cheng, Air Quality Specialist – CEQA IGR Section, at (909) 396-2448, if you have any questions regarding these comments.

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment  
JW:LS:JC  
SBC170425-07  
Control Number

## ATTACHMENT

### Air Quality and Health Risk Assessment (HRA) Analyses

1. SCAQMD staff is concerned that the Health Risk Assessment (HRA) has likely underestimated the cancer risk from the project. In the HRA, the Lead Agency used the AERMOD dispersion model to estimate DPM concentrations from the diesel vehicles generated by the project and used the 2015 revised OEHHA guidelines to estimate the health risks to sensitive receptors in the project vicinity. SCAQMD staff recommends that the Lead Agency revise the HRA based on the following comments.
  - a. In the HRA, the Lead Agency used a 70-year average DPM emissions rate for the 30 years of exposure to estimate health risks. This is not an appropriate methodology to estimate emissions based on the 2015 revised OEHHA guidelines. The 2015 revised OEHHA guidelines acknowledge that children are more susceptible to the exposures to air toxics and have revised the way cancer risks are estimated to take this into account. Since the emissions from the project-generated trucks get cleaner with time due to existing regulations, it would not be appropriate to average out the emissions over a 70-year exposure duration since this would underestimate the health risks to children who would be exposed to higher DPM concentrations during the early years of project operation. Therefore, SCAQMD staff recommends that the DPM emissions for each year of operation be applied to each of the corresponding age bins (i.e. emissions from Year 1 of project operation should be used to estimate cancer risks to the third trimester to 0 year age bin; Year 1 and 2 of project operation should be used to estimate the cancer risks to the 0 to 2 years age bins; and so on).
  - b. Dock loading idling emissions were modeled as individual point sources at four idling locations along the planned loading docks (STCK1 – 4). SCAQMD staff recommends that the Lead Agency revise the HRA using a line volume source that spans the entire dock area to ensure that impacts are properly analyzed.
  - c. Some of the receptors were placed within the volume source exclusion zone, and the results at these locations might not be accurate. This has likely caused the risk results for these receptors not be captured. Therefore, SCAQMD staff recommends that the Lead Agency revise the HRA by using a greater number of smaller volume sources to avoid receptors within the volume source exclusion zone.
  - d. The Lead Agency performed the HRA modeling on July 17, 2016 using EMFAC2011 to calculate emission factors. EMFAC2014 is the most recent available version (approved on December 30, 2014<sup>1</sup>) and was available at the time of analysis. Therefore, SCAQMD staff recommends that the Lead Agency use EMFAC2014 when revising the HRA.

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<sup>1</sup> EMFAC2014. Available at: <https://www.arb.ca.gov/emfac/2014/>.

2. Based on a review of Section 8.3.3 Meteorological Data of the Air Quality Study, three different air monitoring stations were discussed. However, it is unclear which air monitoring station or stations provided meteorological data. Therefore, SCAQMD staff recommends that the Lead Agency clarify which station or stations were used in the Final MND.

### **Siting Warehouses near Residences**

3. Based on the project description, the nearest sensitive receptors are approximately 1.4 mile to the south of the project. While SCAQMD staff recognizes that there are many factors Lead Agencies must consider when making local planning and land use decisions, there are concerns about the proximity of a warehouse to the existing residences and the potential long-term air quality impacts to the people living near the warehouse and along the truck routes as a result of increased truck activities. SCAQMD staff recommends that the Lead Agency use the California Air Resources Board's (CARB) Air Quality and Land Use Handbook as a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land-use decision making process. In CARB's Air Quality and Land Use Handbook, CARB recommends a buffer of at least 1,000 feet between land uses that will have 100 or more trucks per day<sup>2</sup>.

### **Additional Mitigation Measures for Operational Air Quality Impacts (Mobile Sources)**

4. CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate these impacts. In the event that the Lead Agency, after revising the HRA analysis based on the comments provided above, finds that the project would result in significant health risk impacts, SCAQMD staff recommends incorporating the following on-road mobile-source truck related mitigation measures in the Final MND, in addition to the mitigation measures 1) through 24). For more information on potential mitigation measures as guidance to the Lead Agency, please visit SCAQMD's CEQA Air Quality Handbook website<sup>3</sup>.
  - Require the use of 2010 compliant diesel trucks, or alternatively fueled, delivery trucks (e.g., food, retail and vendor supply delivery trucks) at commercial/retail sites upon project build-out. In the event that that 2010 model year or newer diesel trucks cannot be obtained, provide documentation as information becomes available and use trucks that meet EPA 2007 model year NOx emissions requirements<sup>4</sup>. Additionally, consider other measures such as incentives, phase-in schedules for clean trucks, etc.
  - Have truck routes clearly marked with trailblazer signs, so that trucks will not enter residential areas.
  - Limit activities to the amounts analyzed in the MND.

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<sup>2</sup> CARB Air Quality and Land Use Handbook: <http://www.arb.ca.gov/ch/handbook.pdf>. Guidance is for siting new sensitive land uses within 1,000 feet of a distribution center, Page 4. The buffer is a neutral mitigation measure provided to minimize truck activity emission impacts to sensitive receptors. Additionally, in April 2017, ARB published a technical advisory, *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways: Technical Advisory*, to supplement ARB's Air Quality and Land Use Handbook: A Community Health Perspective. This Technical Advisory is intended to provide information on strategies to reduce exposures to traffic emissions near high-volume roadways to assist land use planning and decision-making in order to protect public health and promote equity and environmental justice. Available at: <https://www.arb.ca.gov/ch/landuse.htm>

<sup>3</sup> South Coast Air Quality Management District. <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.

<sup>4</sup> 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).

- Promote clean truck incentive programs (see the discussion above regarding Cleaner Operating Truck Incentive Programs).
- Provide electric vehicle (EV) Charging Stations (see the discussion below regarding EV charging stations).

**Additional Mitigation Measures for Operational Air Quality Impacts (Other Area Sources)**

5. In addition to the mobile source mitigation measures identified above, the Lead Agency should incorporate the following onsite area source mitigation measures below as guidance to further reduce the project's operational air quality impacts.
  - 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.
  - 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.
  - Install light colored "cool" roofs and cool pavements.
  - Limit the use of outdoor lighting to only that needed for safety and security purposes.
  - Require use of electric or alternatively fueled sweepers with HEPA filters.
  - Use of water-based or low VOC cleaning products.