South Coast
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SENT VIA E-MAIL AND USPS: August 7, 2018

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Draft Environmental Impact Report (Draft EIR) for the Proposed Seefried Valley Catawba Warehouse Project (SCH No.:2018041008)

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 CEQA document.

SCAQMD Staff's Summary of Project Description

The lead agency proposes to construct a 376,910-square-foot warehouse with unknown occupants on 17.6 acres (proposed project). The project is located on the southwest corner of Valley Boulevard and Catawba Avenue in the city of Fontana.

SCAQMD Staff's Summary of Air Quality Analysis

The lead agency determined that the proposed project's operational NOx emissions would exceed the SCAQMD's regional air quality significance thresholds. The proposed project's NOx emissions are primarily a result of heavy duty truck activity during operation.

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)[1], 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.

SCAQMD Staff's Comments

As described in the 2016 AQMP, to achieve NOx emission reductions in a timely manner it is critical to attaining the National Ambient Air Quality Standard (NAAQS) for ozone before the 2023 and 2031 deadlines. SCQMD is committed to attain the ozone NAAQS as expeditiously as practicable. The proposed project plays an important role in contributing to NOx emissions. Therefore, SCAQMD staff recommends additional mitigation measures to further reduce NOx emissions in the final CEQA document.

Recommended Additional Mitigation Measures for Regional Air Quality Impacts (Mobile Sources)

CEQA requires that all feasible mitigation measures go beyond what is required by law be utilized to minimize or eliminate any significant adverse impacts. SCAQMD staff recommends incorporating the

[1] 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.

following mitigation measures in the final CEQA document to reduce the proposed project's significant regional NOx emission impacts. For more information on potential mitigation measures as guidance to the lead agency, please visit SCQMD's CEQA Air Quality Handbook website[2].

- Require the use of 2010 and newer haul trucks (e.g., material delivery trucks and soil import/export). In the event that that 2010 model year or newer diesel haul trucks cannot be obtained, provide documentation as information becomes available and use trucks that meet EPA 2007 model year NOx emissions requirements[3], at a minimum. Additionally, consider other measures such as incentives, phase-in schedules for clean trucks, etc.

- Trucks that can operate at least partially on electricity have the ability to substantially reduce the significant NOx impacts from this project. Further, trucks that run at least partially on electricity are projected to become available during the life of the project as discussed in the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS)[4]. It is important to make this electrical infrastructure available when the project is built so that it is ready when this technology becomes commercially available. The cost of installing electrical charging equipment onsite is significantly cheaper if completed when the project is built compared to retrofitting an existing building. Therefore, SCAQMD staff recommends the Lead Agency require the Proposed Project and other plan areas that allow truck parking to be constructed with the appropriate infrastructure to facilitate sufficient electric charging for trucks to plug-in. Similar to the City of Los Angeles requirements for all new projects, SCAQMD staff recommends that the Lead Agency require at least 5% of all vehicle parking spaces (including for trucks) include EV charging stations[5]. Further, electrical hookups should be provided at the onsite truck stop for truckers to plug in any onboard auxiliary equipment. At a minimum, electrical panels should appropriately be sized to allow for future expanded use.

- Have truck routes clearly marked with trailblazer signs, so that trucks will not enter residential areas.

- Limit the daily number of trucks allowed at the facility to levels analyzed in the final CEQA document. If higher daily truck volumes are anticipated to visit the site, the lead agency should commit to reevaluating the proposed project through CEQA prior to allowing this land use or higher activity level.

- Design the warehouse/distribution center such that entrances and exits are such that trucks are not traversing past neighbors or other sensitive receptors.

- Design the warehouse/distribution center such that any check-in point for trucks is well inside the facility property to ensure that there are no trucks queuing outside of the facility.

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[2] South Coast Air Quality Management District. Accessed at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook.

[3] 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).

[4] Southern California Association of Governments. Accessed at: http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx.

[5] City of Los Angeles. Accessed at: http://ladbs.org/LADBSWeb/LADBS_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf.

- Design the warehouse/distribution center to ensure that truck traffic within the facility 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 warehouse/distribution center where trucks can rest overnight.

- Establish area(s) within the facility 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 warehouse/distribution center and sensitive receptors.

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, if you have any questions.

Sincerely,

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SBC180622-06
Control Number