



South Coast Air Quality Management District



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**Mitigated Negative Declaration (MND) for the Proposed
Operon Renaissance Rialto (Environmental Assessment Review No. 2018-0023 & Precise
Plan of Design No. 2018-0020)**

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 the construction and operation of three warehouse buildings of varying sizes, at 30,564 square-feet, 36,584 square-feet, and 69,068 square-feet, totaling 136,216 sf, on an approximate 8.44-acre site (proposed project).¹ The proposed project site is located in the northern portion of the City of Rialto and adjacent to State Route-210 (SR-210). Construction is expected to take roughly 13 months to complete.²

SCAQMD Staff's Summary of Air Quality Analysis

The Lead Agency determined that the proposed project would result in less than significant regional and localized air quality impacts during construction and operation.³ However, based on Table 5-A provided in the traffic impact analysis and Figure 2 of the MND, the proposed project could result in additional truck trips approximately 100 feet from a residential community. Therefore, SCAQMD staff recommends that the Lead Agency consider the detailed comments below.

Health Risk Assessment

Sensitive receptors include residences, schools, hospitals, and similar land uses containing groups of people that are sensitive to air quality. The existing properties located approximately 100 feet northeast from the project site include single-family residences north of Casmalia Street and east of Cedar Avenue. Since the proposed project is a warehouse project that is capable of generating and attracting vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis") can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxicanalysis>. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

Permits and Compliance with SCAQMD Rules

¹ IS/MND. Section 2.3, Pg. 5

² IS/MND. Air Quality and Greenhouse Gas Emissions, Table F, Pg. 30

³ IS/MND. Section 1.3, Pg. 4

In the event that the proposed project requires a permit from the SCAQMD, then the SCAQMD should be identified as a Responsible Agency for the proposed project. The final CEQA document should also demonstrate compliance with applicable SCAQMD Rules, including, but not limited to, Rule 403 – Fugitive Dust. For more information on permits, please visit SCAQMD webpage at: <http://www.aqmd.gov/home/permits>. Questions on permits can be directed to SCAQMD's Engineering and Permitting staff at (909) 396-3385.

Recommended Mitigation Measures

If the Lead Agency determines that the proposed project exceeds SCAQMD CEQA Air Quality Significance Thresholds for emissions resulting from toxic air contaminant impacts during operation the SCAQMD staff recommends that the Lead Agency minimize or eliminate any adverse impacts to air quality by incorporating the mitigation measures below.

- 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, at a minimum. 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 the daily number of trucks allowed at the proposed project to levels analyzed in the CEQA document. If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the proposed project through CEQA prior to allowing this land use or higher activity level.
- Provide electric vehicle (EV) Charging Stations (see the discussion below regarding EV charging stations).
- Should the proposed project generate significant regional emissions, the Lead Agency should require mitigation that requires accelerated phase-in for non-diesel powered trucks. For example, natural gas trucks, including Class 8 HHD trucks, are commercially available today. Natural gas trucks can provide a substantial reduction in health risks, and may be more financially feasible today due to reduced fuel costs compared to diesel. In the Final CEQA document, the Lead Agency should require a phase-in schedule for these cleaner operating trucks to reduce any significant adverse air quality impacts. SCAQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency.
- 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)³. 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. 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 sized to allow for future expanded use.

- Design the industrial building such that entrances and exits are such that trucks are not traversing past neighbors or other sensitive receptors.
- Design the industrial building 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 industrial building 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.
- Limit delivery vehicles' idling time to no more than five minutes. For any delivery vehicle that is expected to take longer than five minutes, the vehicle's operator shall be required to shut off the engine. Notify the vendors of these idling requirements at the time that the delivery purchase order is issued and again when vehicles enter the gates of the facility. To further ensure that drivers understand the vehicle idling requirement, post signs at the facility's entry gates stating that idling longer than five minutes is not permitted.

Conclusion

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the final CEQA Document. The SCAQMD staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Robert Dalbeck, Assistant Air Quality Specialist - CEQA IGR Section, at rdalbeck@aqmd.gov, if you have any questions regarding these comments.

Sincerely,

Daniel Garcia

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Planning, Rule Development & Area Sources

DG/RD

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