



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Draft Environmental Impact Report (EIR) for the Proposed Chino Parcel Delivery Facility Project (SCH No.: 2016121057)

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 EIR.

SCAQMD Staff's Summary of Project Description

The Lead Agency is proposing to demolish 10,040 square feet of existing residential and dairy farm structures for the construction of a 476,285-square-foot warehouse, a 17,480-square-foot maintenance building, an 8,973-square-foot gateway building, and a diesel fueling island with six fueling stations on 74.4 acres (Proposed Project). The Proposed Project is located on the southwest corner of Merrill Avenue and West Flight Avenue. Construction of the Proposed Project is expected to occur over approximately 26 months and become operational in 2020¹. Once operational, the Proposed Project is expected to generate a daily maximum of 1,263 truck trip-ends per day².

SCAQMD Staff's Summary of Air Quality Analysis

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 regional and localized air quality CEQA significance thresholds. The Lead Agency found that the Proposed Project's construction-related air quality impacts would be less than significant, after the implementation of Mitigation Measure (MM) 4.3-1 and MM 4.3-2. MM 4.3-1 and MM 4.3-2 would reduce fugitive dust emissions during construction of the Proposed Project by complying with SCAQMD Rule 403, SCAQMD Rule 1186, and additional dust control measures. The Lead Agency also found that the Proposed Project would result in significant and unavoidable regional air quality impacts during operation [675 pounds per day (lbs/day) of NOx emissions], which would exceed SCAQMD's regional air quality CEQA significance threshold of 55 lbs/day for NOx, even after the implementation of MMs 4.3-3 through 4.3-6. MMs 4.3-3 through 4.3-6 would reduce NOx emissions during operation of the Proposed Project by requiring 50% of on-site yard trucks to be alternatively-powered, requiring building energy consumption to exceed the 2016 California Energy Code, Title 24, Part 6, and restricting on-site idling to less than three minutes. Additionally, the Lead Agency performed a health risk assessment (HRA) analysis and found that the maximum individual cancer risk would be 7.36 in one million and a hazard index of 0.003³, which would not exceed SCAQMD's CEQA significance threshold of 10 in one million for cancer risk and 1.0 for hazard index.

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)⁴, 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

¹ DEIR. Page 4.3-15.

² *Ibid.* Page 3-22.

³ *Ibid.* Appendix C2, *Chino Parcel Delivery Mobile Source Health Risk Assessment*. Page 17.

⁴ 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>.

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 General Comments

As described in the 2016 AQMP, achieving NOx emissions reductions in a timely manner is critical to attaining the National Ambient Air Quality Standard (NAAQS) for ozone before the 2023 and 2031 deadlines. SCAQMD is committed to attaining the ozone NAAQS as expeditiously as practicable and the Proposed Project has an important role in facilitating this goal. As mentioned above, the Proposed Project would result in a maximum daily total of 675 lbs/day of NOx emissions. Of those NOx emissions, heavy-duty truck trips would be responsible for 605 lbs/day (approximately 90% of total emissions). The Proposed Project plays a role in contributing to the Basin-wide NOx emissions. Therefore, SCAQMD staff has comments on existing mitigation measures and recommends that the Lead Agency incorporate additional mitigation measures in the Final EIR to further reduce NOx emissions. Additional details are provided in the attachment. The Proposed Project would also involve, among others, operation of a diesel fueling island with six stations. A permit from SCAQMD would be required, and SCAQMD should be identified as a Responsible Agency for the Proposed Project in the Final EIR. Please see the attachment for details.

Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), SCAQMD staff requests that the Lead Agency provide SCAQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, issues raised in the comments should be addressed in detail 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 will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and to the public who are interested in the Proposed Project. Further, when the Lead Agency makes the finding that the recommended mitigation measures are not feasible, the Lead Agency should describe the specific reasons for rejecting them in the Final EIR (CEQA Guidelines Section 15091).

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 Robert Dalbeck, Assistant Air Quality Specialist, at RDalbeck@aqmd.gov or (909) 396-2139, should you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J. D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment

LS:RD

SBC190307-03

Control Number

ATTACHMENT**Mitigation Measures**

1. The Proposed Project includes a 476,285-square-foot distribution warehouse, which is anticipated to generate approximately 1,263 heavy-duty truck trips per day. These heavy-duty trucks would result in 605 lbs/day of the total 675 lbs/day of NO_x emissions because of the activities associated with the warehouse. 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 long-term operational NO_x emissions, SCAQMD staff recommends that the Lead Agency incorporate the following change to existing MM 4.3-3(b) and incorporate additional mitigation measures in the Final EIR.

SCAQMD Staff Recommended Change to Existing MM 4.3-3 (b)

MM 4.3-3 (b) All At least fifty percent (50%) of the yard trucks used on-site shall be electrically-powered by gasoline, natural gas, and/or electricity. In the event that electrically-powered yard trucks are not feasible at the Proposed Project, the applicant shall provide substantial evidence to the City of Chino to demonstrate that electrically-powered yard trucks are not feasible prior to be allowed to use yard trucks powered by natural gas. In the event that natural gas-powered yard trucks are not feasible at the Proposed Project, the applicant shall provide substantial evidence to the City of Chino to demonstrate natural gas-powered yard trucks are not feasible prior to be allowed to use yard trucks powered by gasoline.

SCAQMD Staff Recommended Additional Mitigation Measures

- a) 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 NO_x 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 NO_x emissions or newer, cleaner trucks. The Lead Agency should include this requirement 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. The Lead Agency should also 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 EIR, where appropriate.
- b) Provide electric vehicle (EV) charging stations. Require at least 5% of all vehicle parking spaces include EV charging stations. Vehicles that can operate at least partially on electricity have the ability to substantially reduce the significant NO_x and ROG impacts. It is important to make this electrical infrastructure available when the Proposed Project is built. The cost of installing electrical charging equipment onsite is significantly cheaper if completed when the project is built compared to retrofitting an existing building. 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. Therefore, SCAQMD staff recommends the Lead Agency require the Proposed Project to provide the appropriate infrastructure to facilitate sufficient electric charging for vehicles to plug-in in the Final EIR. The Lead Agency should also 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 EIR, where appropriate.

- c) 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.
- d) 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.
- e) Develop, adopt and enforce truck routes both in and out of city, and in and out of facilities.
- f) Establish overnight parking within the industrial building where trucks can rest overnight.
- g) Establish area(s) within the Proposed Project site for repair needs.
- h) Provide incentives for employees working at the Proposed Project in order to encourage the use of public transportation or carpooling, such as discounted transit passes or carpool rebates.
- i) Implement a rideshare program for employees working at the Proposed Project and set a goal to achieve a certain participation rate over a period of time.
- j) Maximize use of solar energy including solar panels; installing the maximum possible number of solar energy arrays on the building roofs throughout the apartment complex to generate solar energy for the respective buildings.
- k) Maximize the planting of trees in landscaping and parking lots.
- l) Use light colored paving and roofing materials.
- m) Require use of electric lawn mowers and leaf blowers.
- n) Utilize only Energy Star heating, cooling, and lighting devices, and appliances.
- o) Use of water-based or low VOC cleaning products.

SCAQMD Permits and Compliance with SCAQMD Rules

2. Since the Proposed Project includes, among other, operation of a diesel fueling island with six stations, a permit from SCAQMD would be required. SCAQMD is a Responsible Agency for the Proposed Project (CEQA Guidelines Section 15381) and should be identified as such in the Air Quality Section of the Final EIR. SCAQMD staff recommends that the Lead Agency initiate consultation with SCAQMD as required under CEQA Guidelines Section 15096(b). Mr. Robert Dalbeck, Assistant Air Quality Specialist, is the designated SCAQMD staff to attend meetings requested by the Lead Agency to discuss the scope and content of the EIR (CEQA Guidelines Section 15096(c)).

The Final EIR should also include a discussion to demonstrate compliance with applicable SCAQMD Rules, including, but not limited to, Rule 201 – Permit to Construct⁵, Rule 203 – Permit

⁵ South Coast Air Quality Management District. Rule 201 – Permit to Construct. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>.

to Operate⁶, Rule 461 – Gasoline Transfer and Dispensing⁷, and Rule 1401 – New Source Review of Toxic Air Containments⁸. It should be noted that any assumptions used in the Air Quality and HRA analyses in the Final EIR will be used as the basis for permit conditions and limits. For example, in the HRA of the DEIR, the Lead Agency assumed that the Proposed Project would be considered a fueling island with less than two million gallons per year throughput⁹. It should be also noted that the 2015 revised OEHHA HRA methodology is being used by SCAQMD for determining operational health impacts for permitting applications and also for all CEQA projects where SCAQMD is the Lead Agency. Should there be any questions on permits and applicable SCAQMD rules, please contact the SCAQMD's Engineering and Permitting staff at (909) 396-3385. For more general information on permits, please visit SCAQMD's webpage at: <http://www.aqmd.gov/home/permits>.

⁶ South Coast Air Quality Management District. Rule 203 – Permit to Operate. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>.

⁷ South Coast Air Quality Management District. Rule 461 – Gasoline Transfer and Dispensing. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-461.pdf>.

⁸ South Coast Air Quality Management District. Rule 1401 – New Source Review of Toxic Air Contaminants. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf>.

⁹ DEIR. Appendix C2, *Chino Parcel Delivery Mobile Source Health Risk Assessment*. Page 16.