



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 Cambridge Distribution Building Project at 13215 Cambridge Street

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.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to demolish the existing 92,930-square-foot warehouse and construct a 146,068-square-foot industrial building for warehousing, manufacturing, and distribution uses on 7.17 acres (Proposed Project). Construction is expected to take 12 months¹. Based on a review of Figure 2, *Aerial of the Site*, in the MND and aerial photographs, SCAQMD staff found that the John Glenn High School field is located to the west of the Proposed Project².

SCAQMD Staff's Summary of Air Quality Analysis

In the Air Quality Analysis Section, the Lead Agency quantified the Proposed Project's construction and operation emissions and compared them to SCAQMD's regional and localized air quality CEQA significance thresholds. The Lead Agency found that the Proposed Project's localized air quality impacts from construction would be mitigated to less than significant for PM10 and PM2.5 after the implementation of Mitigation Measure AQ-1³. Mitigation Measure AQ-1 requires that all off-road construction equipment must be equipped with engines meeting the USEPA Tier III emission standards⁴. The Lead Agency also found that the Proposed Project's operational air quality impacts would be less than significant.

SCAQMD Staff's Comments

Tier 4 Construction Equipment or Level 3 Diesel Particulate Filters

CEQA requires that all feasible mitigation measures go beyond what is required by law to minimize any significant impacts. To further reduce particulate matter emissions during construction and minimize their impacts on nearby sensitive receptors (e.g., students and teachers at the John Glenn High School), SCAQMD staff recommends that the Lead Agency use off-road diesel-powered construction equipment that meets or exceeds the CARB and USEPA Tier 4 off-road emissions standards for equipment rated at 50 horsepower or greater during Project construction. Such equipment will be outfitted with Best Available Control Technology (BACT) devices including a CARB certified Level 3 Diesel Particulate Filters (DPF). Level 3 DPFs are capable of achieving at least 85 percent reduction in particulate matter emissions⁵. A list of

¹ MND. Page 7.

² MND. Pages 6 and 11.

³ MND. Table AQ-4. Page 29.

⁴ *Ibid.*

⁵ 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.

CARB verified DPFs are available on the CARB website⁶. These requirements shall be included in applicable bid documents, and successful contractor(s) must demonstrate the ability to supply such equipment. A copy of each unit's certified tier specification or model year specification and CARB or SCAQMD operating permit (if applicable) shall 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 construction equipment cannot meet the Tier 4 engine certification, the Project representative or contractor must demonstrate through future study with written findings supported by substantial evidence that is approved by the Lead Agency before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, reduction in the number and/or horsepower rating of construction equipment, limiting the number of daily construction haul truck trips to and from the Proposed Project, using cleaner vehicle fuel, and/or limiting the number of individual construction project phases occurring simultaneously.

SCAQMD Permits

The Proposed Project will involve new office, manufacturing, warehouse and distribution, assembly, and food production and distribution uses. The Lead Agency should consult with SCAQMD's Engineering and Permitting staff to determine if the uses will involve any equipment that will require a permit or modifications to existing permits from SCAQMD. If a permit from SCAQMD or modifications to existing SCAQMD permits for Facility ID Number: 163635⁷ and/or Facility ID Number: 142283⁸ are required, SCAQMD should be identified as a Responsible Agency for the Proposed Project in the Final MND. Any assumptions used in the Air Quality Analysis in the Final MND will be used as the basis for permit conditions and limits for the Proposed Project. Should there be any questions on permits, 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>.

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. SCAQMD staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact me at lsun@aqmd.gov if you have any questions regarding the enclosed comments.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS

LAC190212-03

Control Number

⁶ *Ibid.* Page 18.

⁷ South Coast Air Quality Management District. FIND. Accessed at: <http://www.aqmd.gov/nav/FIND/facility-information-detail>.

⁸ *Ibid.*