



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 Alder - Baseline Road Project

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 construct a 255,173-square-foot warehouse on 11.63 acres (Proposed Project). The Proposed Project is located on the northwest corner of Alder Avenue and Base Line Road in the City of Rialto.

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 recommended regional and localized air quality CEQA significance thresholds. Based on the analyses, the Lead Agency found that the Proposed Project's regional construction air quality impacts and cumulatively considerable effects would be less than significant. Localized construction and regional operational air quality impacts would also be less than significant after the incorporation of mitigation measures (MM)-AQ-1 and MM-AQ-2¹. MM-AQ-1 has two options to reduce NO_x emissions during operation. Option A limits the number of heavy-duty, diesel-fueled trucks accessing the Proposed Project site to 164 trucks per day, if the truck fleet is older than the 2010 U.S. EPA/CARB truck engine standards. Option B limits the number of heavy-duty, diesel-fueled trucks accessing the Project site to 210 trucks per day, if the truck fleet is wholly or partially older than the 2010 U.S. EPA/CARB truck engine standards². MM-AQ-2 requires that during site preparation phase, construction equipment greater than 150 horsepower shall meet EPA/CARB Tier 3 emissions standards³.

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 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 (NO_x) emissions in 2023 and an additional 55 percent NO_x reduction beyond 2031 levels for ozone attainment.

¹ MND. Pages 45-52.

² *Ibid.*

³ *Ibid.*

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>.

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.

SCAQMD staff is concerned about the cumulative air quality impacts analysis in the MND and has comments on MM-AQ-1 and MM-AQ-2. The Proposed Project would be developed in close proximity to several warehouses that are currently being proposed by the Lead Agency with overlapping construction and operational schedules. Additionally, while MM-AQ-1 discussed the 2010 model year trucks, it was not clear to SCAQMD staff if 2010 model year or newer trucks would be used during operation of the Proposed Project and how the Lead Agency would enforce the use. For example, it was not clear if 164 heavy-duty, diesel-fueled trucks per day allowed under Option A and 210 heavy-duty, diesel-fueled trucks per day allowed under Option B would be required to have a 2010 model year or newer truck engine. Additionally, SCAQMD staff recommends that the Lead Agency revise MM-AQ-2 to require the use of Tier 4 construction equipment of 50 horsepower or greater. Please see the attachment for more information.

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 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 any air quality questions that may arise from this comment letter. Please contact Alina Mullins, Assistant Air Quality Specialist, at amullins@aqmd.gov or (909) 396-2402, should you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment
LS:AM
SBC181221-06
Control Number

ATTACHMENT

Cumulative Air Quality Impacts Analysis

1. The Lead Agency found that the Proposed Project would not have cumulatively considerable environmental effects⁵; however, SCAQMD staff is concerned that the discussion on the cumulative air quality impacts was not adequate because the air quality and health risks impacts of the Proposed Project were not evaluated in connection with the effects of probable future warehouse projects (CEQA Guidelines 15065(a)(3)). Based on a review of the CEQA documents for warehouse projects prepared by the Lead Agency that the SCAQMD received during the months of November and December 2018, SCAQMD staff found that the Proposed Project would be built next to three probable future warehouses⁶ (Table 1: *List of Probable Future Warehouses In the Vicinity of the Proposed Project* and Figure 1: *Probable Future Warehouses In the Vicinity of the Proposed Project*). In the MND, the Lead Agency found that the Proposed Project would not have any significant, adverse cumulative air quality impacts based on the finding that the Proposed Project's project-level regional air quality impacts were less than significant. However, according to Table 1, the Proposed Project's construction and operational activities would overlap with the construction and operational activities of the other three warehouse projects located in the vicinity of the Proposed Project (e.g., within 1,000 feet). As such, the Proposed Project's regional and localized criteria pollutants emissions, as well as health impacts, from heavy-duty, diesel-fueled haul truck trips may have been individually limited, but cumulatively considerable. Additionally, as shown in Figure 1, existing sensitive receptors (e.g., residential uses) are located along West Baseline Road and Palmetto Avenue. Therefore, SCAQMD staff recommends that the Lead Agency revise the air quality analysis to include a meaningful evaluation of the Proposed Project's cumulative air quality and health risks impacts. This facilitates the purpose and goal of CEQA on public disclosure and are useful to decision makers and the public who are interested in the Proposed Project. In the event that the Lead Agency finds that the Proposed Project's effects on air quality would be cumulatively significant, mitigation measures will be required to reduce the effects to less than significant pursuant to CEQA Guidelines Sections 15070 and 15071(e).

Table 1: List of Probable Future Warehouses in the Vicinity of the Proposed Project¹

Project Name	Size (sq.ft)	Location ² (from Proposed Project)	Construction Schedule	Operational Schedule	Estimated Number of Truck Trips During Operation ³
Alder – Baseline Road Project (Proposed Project)	255,173	(Proposed Project)	2018 – 2020	2020	364
Alder II Warehouse	78,680	200 feet North	2018 – 2019	2019	121
Baseline and Tamarind Warehouse	156,500	350 feet West	2018 – 2020	2020	224
CDRE Baseline Warehouse	99,999	1,000 feet West	2019 – 2020	2020	143

Source: SCAQMD. January 4, 2019.

Notes: 1. The table was generated by SCAQMD staff based on the information from the MND for the Alder – Baseline Road Project, the MND for the Alder II Warehouse, the MND for CDRE Baseline Warehouse, and the MND Baseline and Tamarind Warehouse. 2. The location is based on a review of aerial photographs by SCAQMD staff. 3. Estimated number of truck trips was cited from the CEQA documents for the warehouse projects.

⁵ MND. Pages 46-47.

⁶ SCAQMD staff has received three other CEQA documents for the following projects: Alder II Warehouse Project, Baseline and Tamarind Warehouse, and CDRE Baseline Warehouse.

Figure 1: Probable Future Warehouses In the Vicinity of the Proposed Project

Source: SCAQMD. January 4, 2019.

Recommended Changes to Existing Mitigation Measure (MM)-AQ-1 and MM-AQ-2:

2. SCAQMD staff recommends that the Lead Agency incorporate the following changes to MM-AQ-1 and MM-AQ-2 in the Final MND to further reduce the Proposed Project's construction and operational emissions, particularly from NOx. For more information on potential mitigation measures as guidance to the Lead Agency, please visit SCAQMD's CEQA Air Quality Handbook website⁷.

MM-AQ-1: 2010 Model Year or Newer Truck Engines

MM-AQ-1 has two options to reduce NOx emissions during operation. Option A limits the number of heavy-duty, diesel-fueled trucks accessing the Proposed Project site to 164 trucks per day, if the truck fleet is older than the 2010 U.S. EPA/CARB truck engine standards. Implementation of Option A would reduce the Proposed Project's operational NOx emissions to at least 54.44 pounds per day⁸.

⁷ South Coast Air Quality Management District. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.

⁸ MND. Page 44.

Option B limits the number of heavy-duty, diesel-fueled trucks accessing the Proposed Project site to 210 trucks per day, if the truck fleet is wholly or partially older than the 2010 U.S. EPA/CARB truck engine standards. Implementation of Option B would reduce the Proposed Project's operational NOx emissions to at least 54.84 pounds per day⁹.

While the Lead Agency discussed the use of 2010 U.S. EPA/CARB truck engine standards in MM-AQ-1, it was not clear to SCAQMD staff if the Lead Agency is committed to using trucks that comply or exceed the 2010 model year truck engine standard under either Option A or B. For example, it was not clear to SCAQMD staff if 164 heavy-duty, diesel-fueled trucks per day allowed under Option A and 210 heavy-duty, diesel-fueled trucks per day allowed under Option B would be required to have a 2010 model year or newer truck engine. Additionally, neither options included any additional information on the mechanisms that the Lead Agency would implement to enforce the use of 2010 heavy-duty, diesel-fueled trucks during operation. Therefore, SCAQMD staff recommends that at a minimum, the Lead Agency clarify in the Final MND if the number of trucks allowed under Option A or Option B would be 2010 model year trucks.

CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse impacts. To further reduce the NOx emissions during operation, SCAQMD staff recommends that the Lead Agency revise MM-AQ-1 to require that *all* heavy-duty, diesel-fueled trucks accessing the Proposed Project site must meet or exceed the 2010 U.S. EPA/CARB truck engine standard¹⁰. Additionally, it is recommended that the Lead Agency develop incentives and phase-in schedules to encourage the use of zero-emissions or near-zero emissions trucks, if and when feasible. If the Lead Agency finds that 2010 model year or newer diesel haul trucks are not feasible, the Lead Agency should disclose the finding supported by a good faith, reasoned analysis in the Final MND with factual information as substantial evidence, rather than conclusory statements, in the record. Specifically, the Public Resources Code Section 21061.1 defines feasibility to mean "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors" (CEQA Guidelines Section 15364). The feasibility analysis should, at a minimum, include a discussion on these factors.

MM-AQ-2: Tier 4 Construction Equipment

To further reduce the Proposed Project's regional and localized emissions during construction, SCAQMD staff recommends that the Lead Agency incorporate the following changes to MM-AQ-2 in the Final MND.

MM-AQ-2 During ~~the site preparation phase,~~ construction, equipment greater than ~~150~~ 50 horsepower (>~~150~~ 50 HP), the Construction Contractor shall use off-road diesel construction equipment that complies or exceeds ~~with~~ EPA/CARB Tier ~~3~~ 4 emissions standards and will ensure that all construction equipment be tuned and maintained in accordance with the manufacturer's specifications. To ensure that Tier 4 construction equipment or better will be used during the Proposed Project construction, SCAQMD staff recommends that the Lead Agency include this requirement in applicable bid documents, purchase orders, and contracts. Successful contractor(s) must demonstrate the ability to supply the compliant construction equipment for use prior to any ground disturbing and construction activities. A copy of each unit's certified tier specification or

⁹ *Ibid.* Page 45.

¹⁰ 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).

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 construction documents by construction contractor(s) 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 Construction Contractor must demonstrate through future study with written findings supported by substantial evidence that is approved by the Lead Agency before using Tier 3 emissions standards compliant construction equipment and/or 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.

Recommended New Mitigation Measures:

3. In addition to the recommended changes to the existing MM-AQ-1 and MM-AQ-2, SCAQMD staff recommends that the Lead Agency incorporate the following mitigation measures for operational air quality impacts from mobile sources and other area sources in the Final MND.

Mobile Sources

- Require trucks to use the truck route that was analyzed in the Health Risk Assessment of the Final MND.
- Have truck routes clearly marked with trailblazer signs so that trucks will not enter residential areas.
- Limit the daily number of truck trips allowed at the Proposed Project to the level that was analyzed in the Final MND (364 truck trip-ends per day). If higher daily truck volumes are anticipated during operation, the Lead Agency should commit to re-evaluating the Proposed Project's air quality impacts through CEQA prior to allowing higher activity levels.
- Design the Proposed Project such that entrances and exits are such that trucks are not traversing past neighbors or other sensitive receptors.
- Design the Proposed Project 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 Proposed Project 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.
- Provide incentives for employees in order to encourage the use of public transportation or carpooling, such as discounted transit passes or carpool rebates.
- Implement a rideshare program for employees and set a goal to achieve a certain participation rate over a period of time.

Area Sources

Additional mitigation measures for operational air quality impacts from other area sources that the Lead Agency should consider may include the following:

- 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.
- Require the use of electric landscaping equipment, such as lawn mowers and leaf blowers.
- Require use of electric or alternatively fueled sweepers with HEPA filters.
- 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.
- Use of water-based or low VOC cleaning products that go beyond the requirements under SCAQMD Rule 1113.