



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL AND USPS:

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dcasey@rialto.ca.gov

Daniel Casey, Senior Planner
City of Rialto, Development Services Department
Planning Division
150 South Palm Avenue
Rialto, California 92376

Mitigated Negative Declaration (MND) for the Proposed Alder II Warehouse 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 78,680-square-foot warehouse on 4.44 acres (Proposed Project). The Proposed Project is located on the northwest corner of Base Line Road and Alder Avenue 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 and localized construction and operational air quality impacts would be less than significant. Additionally, the Lead Agency found that the Proposed Project would not result in a cumulatively considerable net increase in the emissions of any criteria pollutants. SCAQMD staff has concerns regarding the cumulative air quality impact analysis and has recommendations on new mitigation measures that the Lead Agency should consider and incorporate in the Final MND. 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

SBC181221-08

Control Number

ATTACHMENT

Cumulative Air Quality Impacts Analysis

1. The Lead Agency found that the Proposed Project would not have cumulatively considerable environmental effects¹; however, SCAQMD staff is concerned that the discussion on the cumulative 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 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 warehouses² (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 II Warehouse (Proposed Project)	78,680	(Proposed Project)	2018 – 2019	2019	121
Alder – Baseline Road Project	255,173	200 feet South	2018 – 2020	2020	364
Baseline and Tamarind Warehouse	156,500	700 feet Southwest	2018 – 2020	2020	224
CDRE Baseline Warehouse	99,999	1,400 feet Southwest	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.

¹ MND. Page 19.

² 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 New Mitigation Measures

2. 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 Proposed Project's regional and localized air quality impacts, particularly impacts from NOx emissions, SCAQMD staff recommends that the Lead Agency incorporate the following mitigation measures for mobile sources and other area sources in the Final MND.

Mobile Sources

Mitigation measures for construction and operational air quality impacts from mobile sources that the Lead Agency should consider may include the following:

- Require the use of construction equipment that can operate on alternative fuel or electric battery-power, if commercially available. At a minimum, require the use of Tier 4 construction equipment.

- Require zero-emissions or near-zero emission trucks, if and when feasible; at a minimum, require that the operator commit to utilizing 2010 model year trucks during construction and operation.
- Require the use of yard equipment that can operate on alternative fuel or electric battery-power, if commercially available.
- 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 (121 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.

Area Sources

Additional mitigation measures for operational air quality impacts from 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.