



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 Scheu Distribution Project (SCH No. 2019109040)

South Coast Air Quality Management District (South Coast AQMD) 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.

South Coast AQMD Staff's Summary of Project Description

The Lead Agency proposes to construct four industrial/warehouse buildings totaling 240,710 square feet on 13.23 acres (Proposed Project). The Proposed Project is located on the northeast corner of Archibald Avenue and 7th Street within the City of Rancho Cucamonga. Construction of the Proposed Project is anticipated to occur over 14 months and will include 4,188 heavy-duty haul truck trips during the grading phase¹. Upon review of Figure 2: *Vicinity Map* in the MND and aerial photographs, South Coast AQMD staff found that the Proposed Project is within 56 feet of the existing sensitive receptors (i.e., residential units)². The Proposed Project will be operational by 2019³.

South Coast AQMD Staff's Summary of the 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 South Coast AQMD's recommended regional and localized air quality CEQA significance thresholds. Based on the analysis, the Lead Agency found that the Proposed Project's regional construction air quality impacts would be significant for VOCs at 116 pounds per day (lbs/day) when compared to South Coast AQMD's CEQA air quality significance threshold of VOCs from construction, at 75 lbs/day. All other pollutants would be less than significant, including regional NO_x emissions at 99 lbs/day during the grading phase of construction, which would be slightly below South Coast AQMD's CEQA air quality significance threshold of NO_x from construction, at 100 lbs/day. With implementation of Mitigation Measure (MM) AQ-1, which requires that building surface area be limited to 14,000 square feet or less per day during the architectural coating and painting of construction, construction VOC emissions would be reduced to less than significant at 68 lbs/day⁴. The Lead Agency also found that the Proposed Project's regional and localized operational air quality impacts would be less than significant, and no operational air quality mitigation measures were included⁵.

Although no operational mitigation measures were proposed, the Proposed Project is required to comply with the goals and policies of the Rancho Cucamonga General Plan and Rancho Cucamonga Sustainable Communities Action Plan⁶. These policies include utilizing transportation demand management

¹ MND. Project Description. Page 2.

² *Ibid.* Page 9.

³ *Ibid.* Page 2.

⁴ *Ibid.* Air Quality. Page 38.

⁵ *Ibid.* Page 41.

⁶ *Ibid.* Appendix B: Air Quality and GHG Analysis. Page 7-3.

strategies, such as promoting ride-share programs, and increasing the use of alternative fuels and electric vehicles by requiring alternative fueling stations and providing solar ready infrastructure⁷. Additionally, the Lead Agency has provided recommendations in the MND, which include encouraging trucks accessing the site to be equipped with the latest and most clean diesel fuel technology such as retrofit engines with particle-trapping filters, to ensure that the Proposed Project does not expose sensitive receptors to substantial pollutant concentrations⁸. The Lead Agency has also included in the MND discussions on applicable South Coast AQMD rules⁹, including Rule 402 – Nuisance¹⁰, Rule 403 – Fugitive Dust¹¹, Rule 445 – Wood Burning Devices¹², Rule 1113 – Architectural Coatings¹³, Rule 1143 – Consumer Paint Thinners & Multi-Purpose Solvents¹⁴, Rule 1186 – PM10 Emissions from Paved and Unpaved Roads and Livestock Operations¹⁵, Rule 1303 – New Source Review Requirements¹⁶, and Rule 2202 – On-Road Motor Vehicle Mitigation Options¹⁷.

South Coast AQMD's 2016 Air Quality Management Plan

On March 3, 2017, South Coast AQMD's Governing Board adopted the 2016 AQMP¹⁸, which was later approved by the California Air Resources Board (CARB) 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 (NOx) emissions in 2023 and an additional 55 percent NOx reduction beyond 2031 levels for ozone attainment.

South Coast AQMD Staff's General Comments

Upon review of the MND, South Coast AQMD staff found that daily truck trips during operation that were estimated by CalEEMod are not consistent with the information provided in the Proposed Project-specific Traffic Impact Study (TIS). This could have led to an underestimation of the Proposed Project's operational air quality impacts from mobile sources. Please see the attachment for more information. Additionally, since operation of the Proposed Project generates and/or attracts heavy-duty diesel-fueled vehicles, South Coast AQMD staff recommends that the Lead Agency perform a mobile source Health Risk Assessment (HRA) in the Final MND. Please see the attachment for more information. Finally, to further reduce the Proposed Project's air quality impacts during construction and operation, and to facilitate the achievement of goals and attainment timelines outlined in the 2016 AQMP, the attachment includes a list of recommended mitigation measures, in addition to MM-AQ-1, that the Lead Agency should review and incorporate in the Final MND.

⁷ *Ibid.* Pages 7-3 through 7-6.

⁸ *Ibid.* Page 7-0.

⁹ MND. Appendix B: *Air Quality and GHG Analysis*. Pages 2-8 through 2-9.

¹⁰ South Coast AQMD Rule 402 – Nuisance. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>.

¹¹ South Coast AQMD Rule 403 – Fugitive Dust. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf>.

¹² South Coast AQMD Rule 445 – Wood Burning Devices. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-445.pdf>

¹³ South Coast AQMD. Rule 1113 – Architectural Coatings. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf>.

¹⁴ South Coast AQMD. Rule 1143 – Consumer Paint Thinners & Multi-Purpose Solvents. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1143.pdf>

¹⁵ South Coast AQMD. Rule 1186 – PM10 Emissions from Paved and Unpaved Roads and Livestock Operations. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1186.pdf>

¹⁶ South Coast AQMD. Rule 1303 – New Source Review Requirements. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiii/rule-1303-requirements.pdf>

¹⁷ South Coast AQMD. Rule 2202 – On-Road Motor Vehicle Mitigation Options. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1186.pdf>

¹⁸ South Coast AQMD. March 3, 2017. *2016 Air Quality Management Plan*. Accessed at: <http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan>.

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 South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, responses 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. Further, when the Lead Agency makes the finding that the additional recommended mitigation measures are not feasible, the Lead Agency should describe the specific reasons for rejecting them in the Final MND (CEQA Guidelines Sections 15070 and 15074.1).

South Coast AQMD 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

SBC191016-03

Control Number

ATTACHMENT

Air Quality Analysis – Trip Generation Rate

1. In the TIS for the MND, the Lead Agency found that the Proposed Project would result in 1,190 daily vehicle trips, of which 8% would be from light-duty trucks, 3.9% would be from medium-duty trucks, and 9.5% would be from heavy-duty trucks. Using this truck fleet mix, the Proposed Project would generate 254 truck trips, consisting of light-duty, medium-duty, and heavy-duty trucks, from 1,190 daily vehicle trips¹⁹. However, upon review of the CalEEMod output files in Appendix B: *Air Quality and GHG Analysis*, South Coast AQMD staff found that the fleet mix that was used in CalEEMod to quantify the Proposed Project's operational emissions from mobile sources was not consistent with that in the TIS. For General Light Industrial land uses, CalEEMod version 2016.3.2 generates a default fleet mix of 90% from light duty automobiles and other mobile sources (e.g., motorcycles and buses), and 2% from light-duty trucks, 2% from medium-duty trucks, and 6% would be from heavy-duty trucks²⁰. When the CalEEMod default fleet mix was used, it resulted in 119 truck trips from 1,190 daily vehicle trips²¹, which were substantially short of 254 truck trips (See Table 1) and has likely underestimated the Proposed Project's operational air quality impacts from mobile sources. Therefore, South Coast AQMD staff recommends that the Lead Agency use the Proposed Project-specific fleet mix from the TIS to recalculate the Proposed Project's operational emissions in CalEEMod or provide justification for using the CalEEMod default trip generation rate in the Final MND.

Table 1: South Coast AQMD Staff's Estimated Daily Truck Trips Based on Fleet Mix

	Fleet Mix: Total Truck Trip Percentage ¹	Estimated Daily Truck Trips ²
Proposed Project	21.4%	254
CalEEMod	10%	119
Difference in Estimated Daily Truck Trips:		135

Source: South Coast AQMD staff. November 13, 2019.

Notes: 1. The table was generated by South Coast AQMD staff based on the information from the Scheu Distribution Center MND, Appendix B *Air Quality and GHG Analysis*, and Appendix H *Traffic Impact Study*. 2. Daily Truck Trips were calculated by multiplying the Proposed Project's 1,190 daily vehicle trips by the estimated percentages provided in Appendix H and the defaults provided in CalEEMod.

Mobile Source Health Risk Assessment (HRA) Analysis

2. The Proposed Project includes operation of industrial/warehouse uses, which is expected to generate 254 daily truck trips (See Comment No. 1). However, upon review of the MND, South Coast AQMD staff found that the Lead Agency did not perform a quantitative mobile source HRA analysis as substantial evidence to support a finding that the Proposed Project would not result in significant incremental increases in potential cancer risks to surrounding sensitive receptors (i.e., residential units within 56 feet)²². One of the basic purposes of CEQA is to inform decision-makers and the public about the potential, significant environmental effects of proposed activities (CEQA Guidelines Section 15002(a)(1)). A mitigated negative declaration is appropriate when the Lead Agency finds that the project will not have a significant effect on the environment after incorporating mitigation measures (CEQA Guidelines Sections 15070 to 15075). Reasons to support this finding shall be documented as substantial evidence in the initial study. Without quantifying the Proposed Project's long-term health risk impacts on nearby sensitive receptors during operation, the MND has not made that documentation. Therefore, South Coast AQMD staff recommends that the Lead Agency perform

¹⁹ 254 truck trips = 1,190 daily vehicle trips x (8% light-duty trucks + 3.9% medium-duty trucks + 9.5% heavy-duty trucks).

²⁰ MND. Appendix B: *Air Quality and GHG Analysis*. CalEEMod - Winter Run. PDF page 136.

²¹ 119 truck trips = 1,190 daily vehicle trips x (2% light-duty trucks + 2% medium-duty trucks + 6% heavy-duty trucks).

²² *Ibid.* Air Quality. Page 46.

a mobile source HRA²³ in the Final MND and compare the results to South Coast AQMD's CEQA significance threshold of 10 in one million for cancer risk²⁴. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating air pollutants should also be included.

Additional Recommended Mitigation Measures for Construction and Operational Air Quality Impacts

3. CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate these impacts. To further reduce the Proposed Project's 99 lbs/day NOx emissions during construction, and to facilitate the achievement of goals and attainment timelines outlined in the 2016 AQMP, South Coast AQMD staff recommends that the Lead Agency incorporate the following recommended mitigation measures for construction in the Final MND. Additionally, in the event that, after revisions to the Air Quality Analysis based on Comment Nos. 1 and 2, the Lead Agency finds that the Proposed Project will result in significant adverse air quality impacts during operation that cannot be reduced to less than significant after the implementation of MM-AQ-1, additional feasible mitigation measures are required (CEQA Guidelines Section 15070). South Coast AQMD staff has provided a list of recommended mitigation measures that are capable of reducing the Proposed Project's operational emissions from mobile sources and area sources, and some of which are also capable of facilitating the achievements of goals and policies in the Rancho Cucamonga General Plan and Rancho Cucamonga Sustainable Communities Action Plan. For more information on potential mitigation measures as guidance to the Lead Agency, please visit South Coast AQMD's CEQA Air Quality Handbook website²⁵.

Mitigation Measures for Construction Air Quality Impacts

- a) Require the use of off-road diesel-powered construction equipment that meets or exceeds the California Air Resources Board (CARB) and U.S. Environmental Protection Agency (USEPA) Tier 4 Final off-road emissions standards for equipment rated at 50 horsepower or greater during construction of the Proposed Project. Such equipment will be outfitted with Best Available Control Technology (BACT) devices including a CARB certified Level 3 Diesel Particulate Filter (DPFs). Level 3 DPFs are capable of achieving at least 85 percent reduction in particulate matter emissions²⁶. A list of CARB verified DPFs are available on the CARB website²⁷.

To ensure that Tier 4 Final construction equipment or better would be used during the Proposed Project's construction, South Coast AQMD 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 model year specification and CARB or South Coast AQMD 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

²³ South Coast Air Quality Management District. *Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.

²⁴ South Coast AQMD has developed the CEQA significance threshold of 10 in one million for cancer risk. When South Coast AQMD acts as the Lead Agency, South Coast AQMD staff conducts a HRA, compares the maximum cancer risk to the threshold of 10 in one million to determine the level of significance for health risk impacts, and identifies mitigation measures if the risk is found to be significant.

²⁵ South Coast AQMD. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.

²⁶ CARB. 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.

²⁷ *Ibid*. Page 18.

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 Final 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, construction equipment with Tier 4 Interim or Tier 3 emission standards, 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, and/or limiting construction phases occurring simultaneously.

- b) To further reduce the Proposed Project's emissions during construction, especially from the 4,188 heavy-duty haul truck trips during the grading phase of construction, the Lead Agency should require the use of zero-emission (ZE) or near-zero emission (NZE) on-road haul trucks (e.g., material delivery trucks and soil import/export) such as heavy-duty trucks with natural gas engines that meet the CARB's adopted optional NOx emission standard at 0.02 grams per brake horsepower-hour (g/bhp-hr). When requiring ZE or NZE on-road haul trucks, the Lead Agency should include analyses to evaluate and identify sufficient power and supportive infrastructure available for ZE/NZE trucks in the Energy and Utilities and Service Systems Sections of the Final MND, where appropriate.

CARB also adopted the statewide Truck and Bus Regulation in 2010. The Regulation requires diesel trucks and buses that operate in California to be upgraded to reduce emissions. Newer heavier trucks and buses must meet particulate matter filter requirements beginning January 1, 2012. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent²⁸. Since the construction schedule of the Proposed Project extends beyond 2023 till 2027, 2010 model year trucks will be required for the Proposed Project and should become more widely available commercially. Therefore, South Coast AQMD staff recommends that the Lead Agency implement the Truck and Bus Regulation early and require, at a minimum, that construction vendors, contractors, and/or haul truck operators commit to using 2010 model year or newer engines. Early implementation of the Truck and Bus Regulation at the Proposed Project will develop a construction management plan with a preference for construction contractor(s) who can supply 2010 model year trucks, help facilitate the transition to 2010 model year trucks in 2023, provide time and opportunities to resolve implementation challenges ahead of 2023, ease the costs and burden of regulatory compliance with the Truck and Bus Regulation, and yield emission reductions from fleets earlier than 2023.

To monitor and ensure ZE, NZE, or 2010 model year trucks are used at the Proposed Project, the Lead Agency should require that operators maintain records of all trucks associated with the Proposed Project's construction and make these records available to the Lead Agency upon request. The records will serve as evidence to prove that each truck called to the Proposed Project during construction meets the minimum 2010 model year engine emission standards. Alternatively, the Lead Agency should require periodic reporting and provision of written records by contractors and conduct regular inspections of the records to the maximum extent feasible and practicable.

²⁸ California Air Resources Board. December 20, 2018. <https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm>.

- c) Maintain equipment maintenance records for the construction portion of the Proposed Project. All construction equipment must be tuned and maintained in compliance with the manufacturer's recommended maintenance schedule and specifications. All maintenance records for each equipment and their construction contractor(s) should be made available for inspection and remain on-site for a period of at least two years from completion of construction.
- d) Encourage construction contractors to apply for South Coast AQMD "SOON" funds. The "SOON" program provides funds to applicable fleets for the purchase of commercially-available low-emission heavy-duty engines to achieve near-term reduction of NOx emissions from in-use off-road diesel vehicles. More information on this program can be found at South Coast AQMD's website: <http://www.aqmd.gov/home/programs/business/business-detail?title=off-road-diesel-engines>.
- e) Restrict non-essential diesel engine idle time to not more than five consecutive minutes or another time-frame as allowed by the California Code of Regulations, Title 13 section 2485 - CARB's Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling. For any vehicle delivery that is expected to take longer than five minutes, each project applicant, project sponsor, or public agency will require the vehicle's operator to shut off the engine. Notify the vendors of these idling requirements at the time that the purchase order is issued and again when vehicles enter the gates of the facility. To further ensure that drivers and operators understand the idling requirement, include the idling requirement in the training materials for drivers, operators, and vendors, post signs at the entry of the construction site and throughout the Proposed Project site stating that idling longer than five minutes is not permitted.

Mitigation Measures for Operational Air Quality Impacts from Mobile Sources

- f) Require the use of zero emission (ZE) or near-zero emission (NZE) heavy-duty trucks during operation, such as trucks with natural gas engines that meet CARB's adopted optional NOx emission 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 year²⁹ or newer and cleaner engines that meet CARB's 2010 engine emission standards of 0.01 g/bhp-hr for particulate matter (PM) and the CARB's adopted optional NOx emission standard of 0.20 g/bhp-hr for NOx emissions. Include analyses to evaluate and identify sufficient power available for ZE trucks and supportive infrastructures in the Energy and Utilities and Service Systems Sections of the Final MND, where appropriate.

To monitor and ensure ZE, NZE, or 2010 model year trucks are used at the Proposed Project, the Lead Agency should require that operators maintain records of all trucks associated with the Proposed Project's operation and make these records available to the Lead Agency upon request. The records will serve as evidence to prove that each truck called to the Proposed Project during operation meets the minimum 2010 model year engine emission standards. Alternatively, the Lead Agency should require periodic reporting and provision of written records by operators and conduct regular inspections of the records to the maximum extent feasible and practicable.

²⁹ CARB adopted the statewide On-Road Truck and Bus Regulation in 2010. The Regulation requires diesel trucks and buses that operate in California to be upgraded to reduce emissions. Newer heavier trucks and buses must meet particulate matter filter requirements beginning January 1, 2012. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent. More information on the CARB's Truck and Bus Regulations is available here: <https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm>.

- g) 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 (e.g., residences), where feasible.
- h) Design the Proposed Project such that entrances and exits are such that trucks are not traversing past residences, and other sensitive receptors near the Proposed Project.
- i) 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 and ensure that truck traffic within the Proposed Project site is located away from the property line(s) closest to the sensitive receptors (e.g., residences), which are within 56 feet of the Proposed Project.
- j) Limit the daily number of truck trips allowed at the Proposed Project to the level that was analyzed in the Final MND (e.g., 254 daily truck trips). If higher daily truck volumes are anticipated during operation than what were analyzed in the adopted Final MND, the Lead Agency should commit to re-evaluating the Proposed Project's air quality and health risks impacts through a CEQA process prior to allowing higher truck activity levels (CEQA Guidelines Section 15162).
- k) Require trucks to use the truck routes that are used to analyze the air quality and HRA impacts in the Final MND.
- l) Have truck routes clearly marked with trailblazer signs, so that trucks will not enter residential areas that are adjacent to portions of the designated truck routes analyzed in the Final MND.
- m) Restrict overnight truck parking in residential areas. Establish parking within the Proposed Project where trucks can rest overnight.
- n) Establish area(s) within the Proposed Project site for repair needs and ensure that these designated areas are away from any sensitive land uses.
- o) To help facilitate the achievements of goals and policies defined in the Rancho Cucamonga General Plan and Rancho Cucamonga Sustainable Communities Action Plan, the Lead Agency should require at least five percent of all vehicle parking spaces include electric vehicle (EV) charging stations, or at a minimum, require the Proposed Project to be constructed with the appropriate infrastructure to facilitate sufficient electric charging for trucks to plug-in. 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. The Lead Agency should also include analyses to evaluate and identify sufficient power available for zero emission trucks and supportive infrastructures (e.g., EV charging stations) in the Energy and Utilities and Service Systems Sections of the Final MND, where appropriate.

Mitigation Measures for Operational Air Quality Impacts from Area Sources

- p) To help facilitate the achievements of goals and policies defined in the Rancho Cucamonga General Plan and Rancho Cucamonga Sustainable Communities Action Plan, the Lead Agency should maximize the use of solar energy including solar panels. Installing the maximum possible number of solar energy arrays on the building roofs and/or on the Proposed Project site to generate solar energy for the facility and/or EV charging stations.
- q) Require the use of electric landscaping equipment, such as lawn mowers and leaf blowers.

- r) Require use of electric or alternatively fueled sweepers with HEPA filters.
- s) Maximize the planting of trees in landscaping and parking lots.
- t) Use light colored paving and roofing materials.
- u) Utilize only Energy Star heating, cooling, and lighting devices, and appliances.