



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Draft Environmental Impact Report (Draft EIR) for the Proposed Goodman Logistics Center Fontana III Project (SCH No.: 2019039071)

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 EIR.

South Coast AQMD Staff's Summary of Project Description

The Lead Agency proposes to construct three warehouses totaling 1,118,460 square feet on 47.5 acres (Proposed Project). The Proposed Project is located on the northeast corner of Cypress Avenue and Juniper Avenue. Upon reviews of Figure 2, *Vicinity Map*, aerial photographs, and the discussion on nearby sensitive receptors in the Draft EIR, South Coast AQMD staff found that existing residential uses are within 10 feet of the Proposed Project site¹. Construction would occur in two phases, both of which would occur over nine and a half months². Phase One would occur between April 2020 and February 2021³. Phase Two would occur between May 2021 and February 2022⁴. The Proposed Project is anticipated to be fully operational by 2022⁵. The Proposed Project includes 154 dock doors⁶, 556 parking spaces⁷, and 236 trailer parking spaces⁸. During operation, the Proposed Project is expected to generate 640 heavy-duty, diesel-fueled truck trips per day⁹.

South Coast AQMD Staff's Summary of Air Quality and Health Risk Assessment (HRA) Analyses

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 analyses, the Lead Agency found that the Proposed Project's regional construction air quality impacts would be less than significant, after the implementation of Mitigation Measure (MM) 4.2-1 through MM 4.2-3¹⁰, which require the construction contractor to implement dust control measures, comply with South coast AQMD Rule 1186.1, and use low VOC architectural coatings during construction. Since the Proposed Project would be constructed in two phases, the Lead Agency analyzed an overlapping scenario where the operation of Phase One overlaps with Phase Two of construction. The Lead Agency found and disclosed for informational

¹ Draft EIR. Section 4.2, *Air Quality*. Page 4.2-18.

² *Ibid.* Section 3.0, *Project Description*. Page 3-23.

³ *Ibid.* Section 4.2, *Air Quality*. Page 4.2-17.

⁴ *Ibid.*

⁵ *Ibid.* Appendix A, *Air Quality Report*. Page 43.

⁶ *Ibid.* Section 3.0, *Project Description*. Figure 3-7. Page 3-10

⁷ *Ibid.*

⁸ *Ibid.*

⁹ *Ibid.* Section 3.0, *Project Description*. Page 3-25.

¹⁰ *Ibid.* Section S.0, *Executive Summary*. Page S-9 through S-12,

purposes that the Proposed Project would result in 203 pounds per day (lbs/day) of NOx emissions during the overlapping phases¹¹.

In the Draft EIR, the Lead Agency found that the Proposed Project's long-term regional operational air quality impacts would be significant and unavoidable for NOx at 135 lbs/day¹², after the implementation of MM 4.2-4 through MM 4.2-11¹³, which require idling limitation signs to be posted at the Proposed Project; the owner users and/or tenants to encourage the use of heavy heavy-duty (HHD) truck operators to comply with 13 California Code of Regulations Section 2025; the developer to provide future building occupants with information on obtaining Carl Moyer Program funds; preferential parking for clean air vehicles; signs posted indicating the designated truck route; electrical hookups at loading docks for transportation refrigeration units (TRUs) to utilize during loading/unloading; the developer to establish a Transportation Management Association or a similar mechanism to distribute public transportation information; and installation of solar panels. Additionally, the Lead Agency incorporated by reference the air quality mitigation requirements from the City of Fontana General Plan Update EIR, including MM AQ-1 through MM AQ-5, MM AQ-7, MM AQ-16 through MM AQ-19, and MM AQ-22, which require new buildings energy efficiencies to exceed the applicable (2016) California Title 24 Energy Efficiency Standards by a minimum of 5%; compliance with California Green Standards Code (Part 11 of Title 24 of the California Code of Regulations); on-site forklifts to be powered by electricity, compressed natural gas, or propane; and use of "cool roofs"¹⁴.

The Lead Agency also prepared a mobile source HRA analysis and found that operation of Phase One of the Proposed Project would result in 6.56 in one million for cancer risk and that operation of the Proposed Project at full buildout would result in 6.70 in one million for cancer risk¹⁵, and both of which are below South Coast AQMD's CEQA significance threshold of 10 in one million for cancer risk¹⁶. Additionally, operation of the Proposed Project would result in a hazard index of 0.002¹⁷, which was below South Coast AQMD's CEQA significance threshold of 1.0 for chronic hazard index.

South Coast AQMD's 2016 Air Quality Management Plan

On March 3, 2017, the South Coast AQMD's Governing Board adopted the 2016 Air Quality Management Plan (2016 AQMP)¹⁸, 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 (NOx) emissions in 2023 and an additional 55 percent NOx reduction beyond 2031 levels for ozone attainment.

¹¹ *Ibid.* Appendix A, *Air Quality Report*. Page 51.

¹² *Ibid.* Page 50.

¹³ *Ibid.* Section S.0, *Executive Summary*. Page S-13 through S-15.

¹⁴ *Ibid.* Page S-15 through S-17.

¹⁵ *Ibid.* Appendix B, *Health Risk Assessment Report*. Table ES-2, *Summary of Cancer And Non-Cancer Risks – Scenario 1 – Expansion Conditions*. Page 4.

¹⁶ 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.

¹⁷ Draft EIR. Appendix B, *Health Risk Assessment Report*. Table ES-2, *Summary of Cancer And Non-Cancer Risks – Scenario 1 – Expansion Conditions*. Page 4.

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>.

South Coast AQMD Staff's General Comments

South Coast AQMD staff has comments on the Air Quality Analysis. The construction schedule discussed in the Draft EIR is estimated to be 19 months; however, the Proposed Project's construction emissions were quantified based on a 23-month construction schedule. Using a longer construction duration has likely underestimated the Proposed Project's construction emissions. Please see the attachment for more information. 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. South Coast AQMD is committed to attaining the ozone NAAQS as expeditiously as practicable. With the implementation of the above-mentioned mitigation measures, the Proposed Project would result in 135 lbs/day¹⁹ of NOx emissions during operation and 203 lbs/day of NOx during the overlapping of two development phases, and both of which would exceed South Coast AQMD's operational air quality CEQA significance threshold for NOx emissions at 55 lbs/day. Therefore, the Proposed Project plays an important role in contributing towards the Basin's NOx emissions. To reduce the Proposed Project's NOx emissions, South Coast AQMD staff recommends that the Lead Agency incorporate additional mitigation measures in the Final EIR. Please see the attachment for more information. The attachment also includes recommendations to include discussions of South Coast AQMD rules that may be applicable to the Proposed Project in the Final EIR.

Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), South Coast AQMD staff requests that the Lead Agency provide South Coast AQMD 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, if the Lead Agency makes the finding that the recommended additional mitigation measures are not feasible, the Lead Agency should describe the specific reasons for rejecting them in the Final EIR (CEQA Guidelines Section 15091).

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 me at lsun@aqmd.gov, should you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment
LS:RD
SBC190913-02
Control Number

¹⁹ Draft EIR. Appendix A, *Air Quality Report*. Page 50.

ATTACHMENT**Construction Air Quality Impact Analysis**

1. In the Draft EIR, the Lead Agency stated that construction of the Proposed Project would occur over a 19-month period²⁰. However, the CalEEMod output file showed that the construction schedule was estimated to be approximately 23 months. Calculating emissions using a longer construction duration has likely underestimated the daily usage of construction equipment and activity levels, the number of construction workers required per day, the potential overlapping of construction phases, and the maximum peak daily emissions, which were used to determine the level of significance for the Proposed Project's construction air quality impacts. Therefore, South Coast AQMD staff recommends that the Lead Agency revise the Air Quality Analysis to recalculate the Proposed Project's construction emissions based on a 19-month period schedule in CalEEMod (nine and a half months each). Alternatively, the Lead Agency may include a project design feature, condition of approval, or mitigation measure to restrict the daily construction activity levels to not exceed the activity levels used to estimate construction emissions in the Final EIR. In the event that the Lead Agency finds, after the revisions, that the Proposed Project's construction emissions would exceed South Coast AQMD's recommended air quality CEQA significance thresholds for construction and cannot be reduced to less than significant after the implementation of MM 4.2-1 through MM 4.2-3, additional feasible mitigation measures are required (CEQA Guidelines Section 15126.4). Please see Comment No. 2 below for a list of mitigation measures for construction air quality impacts as resources to the Lead Agency that should be reviewed and incorporated in the Final EIR.

Recommended Air Quality Mitigation Measures – Construction Air Quality Impacts

2. In the event that the Lead Agency finds, after revisions to the Air Quality Analysis based on Comment No. 1, that the Proposed Project would result in significant adverse air quality impacts during construction that cannot be reduced to less than significant after the implementation of MM 4.2-1 through MM 4.2-3, additional feasible mitigation measures will be required (CEQA Guidelines Section 15126.4). South Coast AQMD staff has identified the following air quality mitigation measures during construction that the Lead Agency should review and incorporate in the Final EIR. These recommended mitigation measures are also capable of reducing the significant regional NOx emissions during the overlapping of two development phases.
 - a. Require the use of off-road diesel-powered construction equipment that meets or exceeds the 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 emissions²¹. A list of CARB verified DPFs are available on the CARB website²².

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.

²⁰ Draft EIR, Section 3, *Project Description*. Page 3-22.

²¹CARB. 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.

²² *Ibid*. Page 18.

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 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 that the Lead Agency has already included in the air quality modeling, 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 with the remediation activities.

- b. Require the use of zero-emission or near-zero emission heavy-duty haul trucks during construction, such as trucks with natural gas engines that meet the California Air Resources Board's (CARB) adopted optional NOx emissions standard of 0.02 grams per brake horsepower-hour (g/bhp-hr). At a minimum, require that operators of heavy-duty haul trucks visiting the Proposed Project during construction commit to using 2010 model year²³ 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 NOx emissions or newer, cleaner trucks. 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. Require that contractor(s) maintain records of all trucks visiting the Proposed Project 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. The Lead Agency should conduct regular inspections of the records to the maximum extent feasible and practicable to ensure compliance with this mitigation measure.
- c. Maintain vehicle and equipment maintenance records for the construction portion of the Proposed Project. All construction vehicles must be maintained in compliance with the manufacturer's recommended maintenance schedule. All maintenance records shall 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>.

Recommended Air Quality Mitigation Measures – Operational Air Quality Impacts

3. CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate significant adverse impacts. Since the Proposed Project's mitigated operational NOx emissions at 135 lbs/day would remain significant and unavoidable, South Coast

²³ CARB 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 equivalent. More information on the CARB's Truck and Bus Regulations is available at: <https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.html>.

AQMD staff recommends that the Lead Agency incorporate the following operational mitigation measures in the Final EIR to further reduce those emissions and to facilitate the 2016 AQMP's goals and timeline for reducing Basin-wide NOx emissions and attaining NAAQS for ozone. For more information on potential mitigation measures as guidance to the Lead Agency, please visit South Coast AQMD's CEQA Air Quality Handbook website²⁴.

Mitigation Measures for Operational Air Quality Impacts from Mobile Sources

- a. 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 year²⁵ 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 NOx emissions or newer, cleaner trucks. Include analyses to evaluate and identify sufficient power available for ZE trucks and supportive infrastructure in the Energy and Utilities and Service Systems Sections of the Final EIR, 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.

- b. Provide at least six percent of electric vehicle (EV) charging stations. Pursuant to the 2016 California Green Building Standards Code, Part 11, nonresidential projects with 201 vehicle parking spaces or more should include EV charging stations in at least six percent of all vehicle parking spaces²⁶ and should also include designated parking for clean air vehicles in at least eight percent of all vehicle parking spaces²⁷. Since the Proposed Project includes a total of 556 parking spaces²⁸ and 236 trailer parking spaces²⁹, the Lead Agency should require at least six percent of all vehicle parking spaces to include EV charging stations and at least eight percent of all vehicle parking spaces to be designated for clean air vehicles. Vehicles that can operate at least partially on electricity have the ability to substantially reduce NOx emissions. 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. Additionally, electrical panels should be appropriately sized to allow for future expanded use. Therefore, South Coast AQMD 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.

²⁴ South Coast AQMD. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.

²⁵ 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>.

²⁶ 2016 California Green Building Standards Code, Part 11. Chapter 5, *Nonresidential Mandatory Measures*. Table 5.106.5.3.3. Page 35. Accessed at: <https://codes.iccsafe.org/content/chapter/10708/>.

²⁷ *Ibid.* Table 5.106.5.2. Page 34. Accessed at: <https://codes.iccsafe.org/content/chapter/10708/>.

²⁸ Draft EIR. Section 3.0, *Project Description*. Figure 3-7. Page 3-10

²⁹ Draft EIR. Section 3.0, *Project Description*. Figure 3-7. Page 3-10

Additionally, the Lead Agency should 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 EIR, where appropriate.

- c. Design the Proposed Project such that the dock doors are located as far away as feasible from the residences located south and east of the Proposed Project. This could minimize the exposure of sensitive receptors to DPM from trucks entering/exiting and idling at the Proposed Project.
- d. 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.
- e. 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.
- f. 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).
- g. Limit the daily number of truck trips allowed at the Proposed Project to the level that was analyzed in the Final EIR (e.g., 640 daily truck trips). If higher daily truck volumes are anticipated during operation than what was analyzed in the certified Final EIR, 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 activity levels (CEQA Guidelines Section 15162).
- h. Require trucks to use the truck routes that were used to analyze the air quality and HRA impacts in the Final EIR.
- i. 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 EIR.
- j. Restrict overnight truck parking in residential areas. Establish parking within the Proposed Project where trucks can rest overnight.
- k. Establish area(s) within the Proposed Project site for repair needs and ensure that these designated areas are away from any sensitive land uses.

Mitigation Measures for Operational Air Quality Impacts from Area Sources

- a. 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 warehouse and/or EV charging stations.
- b. Require the use of electric landscaping equipment, such as lawn mowers and leaf blowers.
- c. Require use of electric or alternatively fueled sweepers with HEPA filters.
- d. Maximize the planting of trees in landscaping and parking lots.

- e. Use light colored paving materials.
- f. Utilize only Energy Star heating, cooling, and lighting devices, and appliances.

Guidance Regarding Warehouses Sited Near Sensitive Receptors

4. South Coast AQMD staff recognizes that there are many factors Lead Agencies must consider when making local planning and land use decisions. To facilitate stronger collaboration between Lead Agencies and South Coast AQMD to reduce community exposure to source-specific and cumulative air pollution impacts, South Coast AQMD adopted the *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*³⁰ in 2005. Additional guidance is available in the California Air Resources Board (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective*, available at: <https://www.arb.ca.gov/ch/handbook.pdf>. For warehouses that accommodate more than 100 trucks per day, or more than 40 trucks with operating TRUs per day, a 1,000-foot separation between sensitive land uses (e.g., residential uses)³¹ and the operating warehouse is recommended. Because the Proposed Project includes operation of a warehouse that would accommodate up to 640 heavy-duty truck trips per day³², South Coast AQMD staff recommends that the Lead Agency review and consider these guidance when making local planning and land use decisions.

Responsible Agency, Permits, and Compliance with South Coast AQMD Rules

5. Implementation of the Proposed Project may require permits from South Coast AQMD. If operation of the Proposed Project will involve the use of any stationary diesel-fueled internal combustion or compression engines (i.e., generators or firefighting equipment), South Coast AQMD Rule 1470 – Requirement for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines³³ and South Coast AQMD Rule Series 1146 – Emissions of Oxides of Nitrogen from Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters³⁴, including Rule 1146.1 – Emissions of Oxides of Nitrogen from Small Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters³⁵ and Rule 1146.2 – Emissions of Oxides of Nitrogen from Large Water Heaters and Small Boilers and Process Heaters³⁶ would apply and should be discussed in the Air Quality Section of the Final EIR. Additionally, in the event that the use of three or more Stationary Emergency Standby Diesel-Fueled Internal Combustion Engines rated at greater than 50 brake horsepower (>50 bhp) is reasonably foreseeable, the Lead Agency should include a discussion on South Coast AQMD Rule 1472 – Requirement for Facilities with Multiple Stationary Emergency Standby Diesel-Fueled Internal Combustion³⁷. Therefore, South Coast AQMD staff recommends that the Lead Agency consult with South Coast AQMD Permitting and Engineering staff

³⁰ South Coast AQMD. May 2005. *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*. Accessed at: <http://www.aqmd.gov/home/library/documents-support-material/planning-guidance/guidance-document>.

³¹ CARB. *Air Quality and Land Use Handbook: A Community Health Perspective*. Page 4. Accessed at: <https://www.arb.ca.gov/ch/handbook.pdf>.

³² Based on the heavy-duty truck trip generation information provided in the traffic impact analysis, 640 truck trip ends would equate to approximately 320 trucks per day.

³³ South Coast AQMD. Rule 1470 – Requirement for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf>.

³⁴ South Coast AQMD. Rule 1146 – Emissions of Oxides of Nitrogen from Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1146.pdf>.

³⁵ South Coast AQMD. Rule 1146.1 – Emissions of Oxides of Nitrogen from Small Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1146-1.pdf>.

³⁶ South Coast AQMD. Rule 1146.2 – Emissions of Oxides of Nitrogen from Large Water Heaters and Small Boilers and Process Heaters. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1146-2.pdf>.

³⁷ South Coast AQMD. Rule 1472 – Requirements for Facilities with Multiple Stationary Emergency Standby Diesel-Fueled Internal Combustion Engines. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1472.pdf>.

as early as feasible to determine permit requirements and any applicable rules and regulations that should be discussed in the Final EIR for the Proposed Project. Additionally, in the event that the Proposed Project will use new stationary equipment that requires a permit from South Coast AQMD, the Lead Agency should identify South Coast AQMD as a Responsible Agency for the Proposed Project in the Final EIR. Questions on permits and applicable South Coast AQMD rules can be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385. For more general information on permits, please visit South Coast AQMD's webpage at: <http://www.aqmd.gov/home/permits>.