



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 Interstate 15 (I-15) Logistics Center Project (SCH No.: 2018011008)

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 a 1,175,720-square-foot warehouse and realign Lytle Creek Road on 76 acres (Proposed Project). The Proposed Project also includes annexation of 152 acres of the County of San Bernardino into the City of Fontana. The Proposed Project is located on the southeast corner of Lytle Creek Road and Sierra Avenue. Construction is anticipated to begin in the first half of 2020, and the Proposed Project is anticipated to be fully operational by 2021¹. During operation, the Proposed Project is expected to generate 634 truck trips per day².

South Coast AQMD 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 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 Measures (MMs) AQ-1. MM AQ-1 requires the construction contractor to implement dust control measures. The Lead Agency also found that the Proposed Project's operational air quality impacts would be significant and unavoidable for NO_x at 147 lbs/day³, after the implementation of MM-AQ-2 through MM-AQ-4⁴. MM-AQ-2 through MM-AQ-4 require the facility to have idling limitation signs posted on-site; the project applicant to provide information to the tenants on clean technology funding opportunities; and install two on-site electric vehicle charging stations⁵. The Lead Agency also prepared a Mobile Source Health Risk Assessment (HRA) analysis and found that operation of the Proposed Project would result in a cancer risk of 6.48 in one million, averaged over 30 years, and 7.63 in a million, averaged over 70 years⁶, which would be below South Coast AQMD's CEQA significance threshold of 10 in one million for cancer risk⁷.

¹ Draft EIR. Section 3.0, *Air Quality*. Page 3.0-10.

² *Ibid.* Section 4.13, *Transportation*. Page 4.13-13.

³ *Ibid.*

⁴ *Ibid.* Page 4.2-16.

⁵ *Ibid.* Section 1, *Executive Summary*. Page 1.0-5 and 1.0-6.

⁶ *Ibid.* Appendix B, *Air Quality Impact Analysis, Health Risk Assessment, Green House Gas Emissions Report*. Table 2, *Maximum Operational Cancer Risk at Project Vicinity Residences*. Page 24.

⁷ 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.

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)⁸, 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.

South Coast AQMD Staff's General Comments

South Coast AQMD staff has comments on the Air Quality Analysis. South Coast AQMD staff found an inconsistency between the proposed construction schedule discussed in the Draft EIR and the construction schedule used to calculate emissions that may have likely underestimated the Proposed Project's construction emissions. Additionally, the Lead Agency used multiple air dispersion model input parameters that may have led to an underestimation of the cancer risk resulting from operation of the Proposed Project. Please see 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 MM-AQ-1 through MM-AQ-4, the Proposed Project would result in 86 lbs/day⁹ of NOx emissions during construction and 147 lbs/day¹⁰ of NOx emissions during operation. Therefore, the Proposed Project plays an important role in contributing towards the Basin's NOx emissions. To further reduce those emissions, particularly operational 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, when the Lead Agency makes the finding that the recommended revisions to MM-AQ-1 and 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 Robert Dalbeck, Assistant Air Quality Specialist, at RDalbeck@aqmd.gov or (909) 396-2139, should you have any questions.

⁸ 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>.

⁹ Draft EIR. Section 4.2 Air Quality. Page 4.2-14.

¹⁰ *Ibid*. Page 4.2-16.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment

LS:RD

SBC190813-06

Control Number

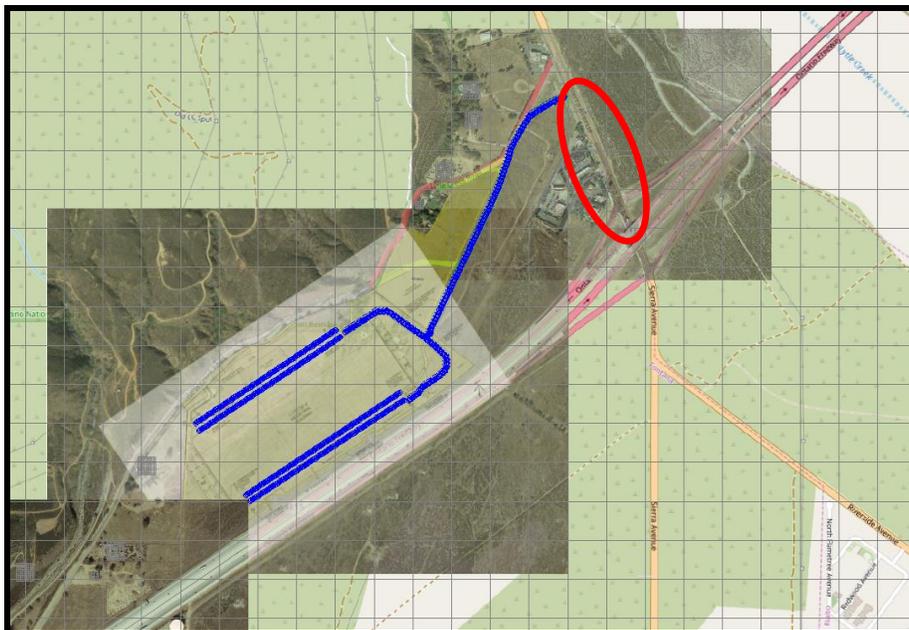
ATTACHMENT**Construction Air Quality Impact Analysis**

1. In the Draft EIR, the Lead Agency identifies that construction of the Proposed Project would occur over a 12-month period. However, the CalEEMod output file shows that the construction schedule was estimated to be 24 months. Calculating emissions using a longer construction duration may have likely underestimated the daily activity level and the maximum emissions that could occur in a day. Therefore, South Coast AQMD staff recommends that the Lead Agency revise the construction schedule in CalEEMod to occur within a 12-month period and re-calculate construction emissions. Alternatively, the Lead Agency may include a project design feature, condition of approval, or mitigation measure to restrict the daily construction activity to not exceed the activity level 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, feasible mitigation measures are required (CEQA Guidelines Section 15126.4). Please see Comment No. 4 below for potential mitigation measures that would reduce construction emissions from the Proposed Project.

Dispersion Modeling and Health Risk Calculation

2. The Lead Agency used AERMOD to model the dispersion of the Proposed Project's emissions and perform a health risk assessment (HRA). In AERMOD, the Lead Agency modeled the dispersion of diesel particulate matter (DPM) emissions from heavy-duty trucks entering and exiting the Proposed Project, onsite travel, and trucks idling at the proposed dock doors. As illustrated in Figure 1, trucks entering and exiting the Proposed Project were modeled as a line-volume source from the Proposed Project's boundary to Sierra Avenue. However, it is recommended that mobile source emissions resulting from heavy-duty trucks visiting the Proposed Project be modeled to the nearest freeway on-/off-ramp. Therefore, South Coast AQMD staff recommends that the Lead Agency revise the air dispersion modeling to account for trucks traveling to and from the nearest freeway, in this case Interstate 15 (circled in red in Figure 1).

Figure 1: South Coast AQMD Staff's Screenshot of Proposed Project's Line-Volume Truck Emission Sources in AERMOD



Note: The Air Dispersion modeling files were provided to South Coast AQMD staff for review on September 12, 2019. Screenshot captured on September 24, 2019.

3. The Lead Agency used the Hotspots Analysis and Reporting Program 2 (HARP2) software to calculate the Proposed Project's cancer risk. When calculating cancer risk in HARP2, users can select among multiple exposure pathways. Here, the Lead Agency only selected the inhalation exposure pathway. South Coast AQMD staff recommends selecting the option "SCAQMD mandatory minimum pathways" to include additional exposure pathways for soil ingestion, mother's milk, homegrown produce, and dermal exposure to calculate the Proposed Project's cancer risk or provide a rationale to justify why other exposure pathways were not selected in the Final EIR.

Recommended Air Quality Mitigation Measures – Construction Air Quality Impacts

4. 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, 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.
 - 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 emissions¹¹. A list of CARB verified DPFs are available on the CARB website¹².

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 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

¹¹ 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.

¹² *Ibid*. Page 18.

commit to using 2010 model year¹³ 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. Limit the daily number of construction haul truck trips allowed at the Proposed Project to levels analyzed in the Final EIR. If higher daily truck volumes are anticipated to visit the Proposed Project, the Lead Agency should commit to re-evaluating the Proposed Project through a CEQA process prior to allowing the higher activity level.
- d. 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.
- e. 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 Mitigation Measures – Operational Air Quality Impacts

5. 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 significant adverse impacts. After the implementation of MM AQ-2 through MM AQ-4, the Proposed Project's operational NOx emissions would remain significant and unavoidable (147 lbs/day). To further reduce those emissions 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 operational mitigation measures in the Final EIR. For more information on potential mitigation measures as guidance to the Lead Agency, please visit South Coast AQMD's CEQA Air Quality Handbook website¹⁴.

- 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 year¹⁵ or newer engines that meet CARB's 2010 engine emission standards of 0.01 g/bhp-hr for particulate matter (PM)

¹³ 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>.

¹⁴ South Coast AQMD. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.

¹⁵ 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>.

and 0.20 g/bhp-hr of NO_x emissions or newer, cleaner trucks. 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 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.

- Design the Proposed Project such that the dock doors are located as far away as feasible from the residences located north and south of the Proposed Project. This could minimize the exposure of sensitive receptors to DPM from trucks entering/exiting and idling at the Proposed Project.
- 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.
- 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.
- 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).
- Limit the daily number of truck trips allowed at the Proposed Project to the level that was analyzed in the Final EIR (e.g., 634 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).
- Require trucks to use the truck routes that were used to analyze the air quality and HRA impacts in the Final EIR.
- 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.
- Restrict overnight truck parking in residential areas. Establish parking within the Proposed Project where trucks can rest overnight.
- Establish area(s) within the Proposed Project site for repair needs and ensure that these designated areas are away from any sensitive land uses.

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

Implementation of the Proposed Project may require permits from South Coast AQMD. If operation of the Proposed Project will involve the use of 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 Engines¹⁶ and South Coast AQMD Rule Series 1146 – Emissions of Oxides of Nitrogen from Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters¹⁷, including Rule 1146.1 – Emissions of Oxides of Nitrogen from Small Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters¹⁸ and Rule 1146.2 – Emissions of Oxides of Nitrogen from Large Water Heaters and Small Boilers and Process Heaters¹⁹ 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 Combustion²⁰. Therefore, South Coast AQMD staff recommends that the Lead Agency consult with South Coast AQMD Permitting and Engineering staff as early as feasible to determine permit requirements and any applicable rules and regulations that should be discussed in the CEQA document 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>.

¹⁶ 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>.

¹⁷ 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>.

¹⁸ 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>.

¹⁹ 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>.

²⁰ 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>.