



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

January 21, 2020

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Mitigated Negative Declaration (MND) for the Proposed Bridge Point Upland Project

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 201,096 square feet of non-refrigerated warehouse and parcel delivery services with office uses on a 50.25-acre site that is currently used for outdoor rock/gravel stockpiling and processing¹ (Proposed Project). The Proposed Project is located on the northeast corner of Foothill Boulevard and Central Avenue in the City of Upland. Construction of the Proposed Project is anticipated to occur over seven months². Once operational by the third quarter of 2020, the Proposed Project will have 16 dock doors and eight van loading doors⁵, and involve 50 truck trips per day³. Based on reviews of Figure 2: *Project Vicinity Map* in the MND and aerial photographs, the Proposed Project is surrounded by existing commercial uses⁴.

South Coast AQMD Staff's Summary of the Air Quality and Health Risk Assessment Analyses

The Lead Agency analyzed the Proposed Project's air quality impacts based on 276,250 square feet, which were 75,154 square feet greater than 201,096 square feet as currently envisioned for the Proposed Project⁵. 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 CEQA air quality significance thresholds. Based on the analysis, the Lead Agency found that the Proposed Project's construction and operational air quality impacts would be less than significant⁶. The Lead Agency is committed to implementing three air quality mitigation measures AQ-1 through AQ-3⁷. AQ-1 requires compliance with South Coast AQMD Rules 402 and 403. AQ-2 requires architectural coating products to have a volatile organic compound (VOC) rating of 50 grams per liter or less. AQ-3 requires, among others, at least six percent of vehicle parking spaces (including trucks) designed to accommodate electric vehicle (EV) charging stations, all service equipment such as fork lifts and yard trucks be powered by electricity or natural gas, and providing building occupants with information related to the South Coast AQMD's Carl Moyer Program or other programs that promote truck retrofits or clean vehicles⁸. The Lead Agency did not perform a health risk assessment in the MND.

¹ MND, Page 10.

² *Ibid.* Page 2.

³ *Ibid.* Page 17.

⁴ *Ibid.* Page 26.

⁵ *Ibid.* Page 1.

⁶ *Ibid.* Page 22, 27-28.

⁷ *Ibid.* Pages 3-4.

⁸ *Ibid.*

South Coast AQMD Staff's General Comments

In the Air Quality Analysis, the Lead Agency used a trip length of 6.9 miles to calculate the Proposed Project's operational air quality impacts from mobile sources. The default one-way trip length is 20 miles⁹. Using a trip length of 6.9 miles likely underestimated the Proposed Project's operational air quality impacts, particularly NOx emissions, from trucks that will visit the Proposed Project during operation. Additionally, although the Proposed Project involves operation of warehouse uses, the Lead Agency did not perform a mobile source health risk assessment analysis. Please see the attachment for more information. To further reduce the Proposed Project's long-term emissions from mobile sources, South Coast AQMD staff recommends revisions to the existing air quality mitigation measures and a list of new mitigation measures that the Lead Agency should review and incorporate in the Final MND. The attachment also includes a discussion on South Coast AQMD Rule 403(e).

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 supported by substantial evidence 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 Margaret Isied, Assistant Air Quality Specialist, at misied@aqmd.gov or (909) 396-2543, should you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment
LS:MI
SBC191220-07
Control Number

⁹ CalEEMod Appendix A: Calculation Details for CalEEMod. Page 14.

ATTACHMENT

Air Quality Impact Analysis – Operational Mobile Source Emissions

1. The Lead Agency used a trip length of 6.9 miles to quantify the Proposed Project's operational emissions from mobile sources but did not discuss how this trip length was developed. CalEEMod is the software model that quantify land use projects' emissions. The Lead Agency used CalEEMod to quantify the Proposed Project's construction and operational emissions. The default one-way trip length in CalEEMod is 20 miles¹⁰. Using a trip length of 6.9 miles likely underestimated the Proposed Project's air quality emissions, particularly NOx, from trucks during operation. To conservatively analyze a worst-case operational impact scenario, South Coast AQMD staff recommends that the Lead Agency recalculate the Proposed Project's operational emissions based on a 20-mile one way trip length, or provide substantial evidence to support the use of 6.9 miles in the Final MND. distance included in CalEEMod. If the Lead Agency finds, after revising the Air Quality Analysis, that the Proposed Project's air quality impact would be significant and cannot be mitigated to be less than significant with the existing three air quality mitigation measures, the Lead Agency should strengthen existing air quality mitigation measures or include new air quality mitigation measures in the Final MND. (See also Comment No. 3).

Mobile Source Health Risk Assessment (HRA) Analysis

2. As stated above, the Proposed Project involves operation of warehouse and parcel delivery services, which are expected to generate approximately 50 truck trips per day. Diesel particulate matter (DPM) will be emitted from the transportation and idling of trucks visiting the Proposed Project. DPM has been identified by the California Air Resources Board (CARB) as a toxic air contaminant (TAC) based on its carcinogenic effects¹¹. However, upon review of the MND, South Coast AQMD staff found that the Lead Agency did not perform a quantitative mobile source HRA analysis.

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. Therefore, South Coast AQMD staff recommends that the Lead Agency perform a mobile source HRA analysis¹² in the Final MND and compare the results to South Coast AQMD's CEQA significance threshold of 10 in one million for cancer risk¹³; otherwise, the Lead Agency has not met CEQA's requirement for documentation. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating air pollutants should also be included.

Recommended Changes to Mitigation Measures Air Quality (AQ)-2 and 3

3. South Coast AQMD staff recommends that the Lead Agency incorporate the following changes to mitigation measures AQ-2 and AQ-3 in the Final MND.

¹⁰ Appendix A-1: Air Quality Assessment. Page 152.

¹¹ CARB. August 27, 1998. Resolution 98-35. Accessed at: <http://www.arb.ca.gov/regact/diesltac/diesltac.htm>.

¹² 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>.

¹³ 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.

Mitigation Measure AQ-2

- a) The Lead Agency requires architectural coating products used at the Proposed Project to have a VOC rating of 50 grams per liter or less. To further reduce VOC emissions from architectural coatings, South Coast AQMD staff recommends that the Lead Agency requires the use of water-based or low VOC cleaning products that go beyond the requirements of South Coast AQMD Rule 1113¹⁴.

Mitigation Measure AQ-3

- b) The Lead Agency has committed to implementing Mitigation Measure AQ-3. One of the requirements for the developer/successor-in-interest is to provide building occupants with information related to the South Coast AQMD Carl Moyer Program, or other such programs that promote truck retrofits or “clean” vehicles¹⁵.

Pursuant to CEQA Guidelines Section 15126.4, mitigation measures are those capable of minimizing or reducing significant adverse impacts. While it is important to share information about South Coast AQMD’s Carl Moyer Program and the State’s clean truck fleets programs, providing information alone does not minimize or reduce emissions. The Lead Agency should go beyond providing information by requiring 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 the CARB’s adopted optional NOx emission standard of 0.02 grams per brake horsepower-hour (g/bhp-hr). At a minimum, the Lead Agency may require that operators of heavy-duty trucks visiting the Proposed Project during operation commit to using 2010 model year 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.

To monitor and ensure ZE, NZE, or 2010 model year or newer 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 trucks visiting the Proposed Project meet 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.

Additional Recommended Mitigation Measures

4. 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 air quality impacts during construction and operation, and in addition to mitigation measures AQ-1 through AQ-3, South Coast AQMD has compiled a list of additional recommended mitigation measures as guidance that the Lead Agency should review for incorporation in the Final MND. For more information on potential mitigation measures as guidance to the Lead Agency, please visit South Coast AQMD’s CEQA Air Quality Handbook website¹⁶.

¹⁴ South Coast AQMD. Rule 1113 – Architectural Coatings. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf>.

¹⁵ MND. Page 4.

¹⁶ South Coast AQMD. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.

Mitigation Measures Construction Air Quality Impacts

- a) Require construction equipment that meets U.S. EPA Tier 4 Final off-road emission standards. 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 reduction in the number and/or horsepower rating of construction equipment and/or limiting the number of construction equipment operating at the same time.
- b) 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.

Mitigation Measures for Operational Air Quality Impacts from Mobile Sources

- a) Limit the daily number of truck trips allowed at the Proposed Project to the level that was analyzed in the MND (e.g., 50 daily truck trips). If higher daily truck volumes are anticipated during operation than what were analyzed in the 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).
- b) 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.
- c) Establish area(s) within the Proposed Project site for repair needs and ensure that these designated areas are away from any sensitive receptors.

Mitigation Measures for Operational Air Quality Impacts from Area Sources

- d) 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 that the Lead Agency requires in mitigation measure AQ-3.
- e) Require the use of electric landscaping equipment, such as lawn mowers and leaf blowers.
- f) Maximize the planting of trees in landscaping and parking lots.

- g) Use light colored paving and roofing materials.
- h) Utilize only Energy Star heating, cooling, and lighting devices, and appliances.

Compliance with South Coast AQMD Rule 403(e)

5. The Lead Agency included a discussion of general compliance with South Coast AQMD Rule 403 – Fugitive Dust in the MND. Since the Proposed Project is a large operation of approximately 50.25 acres¹⁷ (50-acre sites or more of disturbed surface area; or daily earth-moving operations of 3,850 cubic yards or more on three days in any year) in the South Coast Air Basin, the Lead Agency is required to comply with Rule 403(e) – Additional Requirements for Large Operations¹⁸. Additional requirements may include, but are not limited to, Large Operation Notification (Form 403 N), appropriate signage, additional dust control measures, and employment of a dust control supervisor that has successfully completed the Dust Control in the South Coast Air Basin training class¹⁹. Therefore, South Coast AQMD recommends that the Lead Agency include a discussion to demonstrate specific compliance with South Coast AQMD Rule 403(e) in the Final MND. Compliance with South Coast Rule 403(e) will further reduce regional and localized emissions from particulate matters during construction.

¹⁷ MND. Page 1.

¹⁸ South Coast AQMD. Rule 403. Last amended June 3, 2005. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf>.

¹⁹ South Coast AQMD Compliance and Enforcement Staff's contact information for Rule 403(e) Large Operations is (909) 396-2608 or by e-mail at dustcontrol@aqmd.gov.