



# South Coast Air Quality Management District

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SENT VIA E-MAIL:

August 11, 2021

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## **Draft Environmental Impact Report (Draft EIR) for the Speedway Commerce Center (Proposed Project) (SCH No.: 2020090076)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The City of Rancho Cucamonga is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. The following comments included recommended changes to air quality mitigation measures and information on South Coast AQMD Rules 2305 and 316 that the Lead Agency should include in the Final EIR.

### South Coast AQMD Staff's Summary of Project Description in the Draft EIR

The Proposed Project consists of construction and operation of two warehouses totaling 655,878 square feet on 35.73 acres. Based on the Draft EIR, the Proposed Project would include electrical hookups for tenants that require cold storage during operation. The Proposed Project is located on the northeast corner of Etiwanda Avenue and Napa Street in the City of Rancho Cucamonga (City). Based on a review of aerial photographs, the Proposed Project is immediately surrounded by vacant lands and warehouse uses, and the closest sensitive receptors (e.g., residents) are located 730 feet to the north on the northwest corner of Arrow Route and Ilex Street. Additional residents are located further north along Foothill Boulevard between Interstate 15 (I-15) and Cherry Avenue. Construction of the Proposed Project will occur in a 10-month period. At full buildout in 2022, the Proposed Project would generate 369 daily truck trips, including 63 trips from 2-Axle trucks, 84 trips from 3-Axle trucks, and 222 trips from 4+-Axle trucks<sup>1</sup>. Based on the City's General Plan, Arrow Route, Foothill Boulevard, and Sixth Street are identified as the nearest major east/west truck routes and Etiwanda Avenue, Rochester Avenue, and Milliken Avenue as the nearest identified north/south truck routes<sup>2</sup>.

### South Coast AQMD Staff's Comments

#### *Recommended Changes to Mitigation Measure AQ-6*

The Draft EIR included nine air quality mitigation measures. Mitigation Measure AQ-6 requires the posting of signs at every truck exit driveway to provide directional information to the truck route<sup>3</sup>. Based on the air dispersion modeling for the Proposed Project's health risk assessment, truck routes included the following<sup>4</sup>:

- Fourth Street – I-15 south bound (SB) ramps to north bound (NB) ramps
- Fourth Street – I-15 NB ramps to Etiwanda Avenue

<sup>1</sup> Draft EIR. Appendix A. Table 3, *Diesel Particulate Matter Emissions Rates*. Page 16.

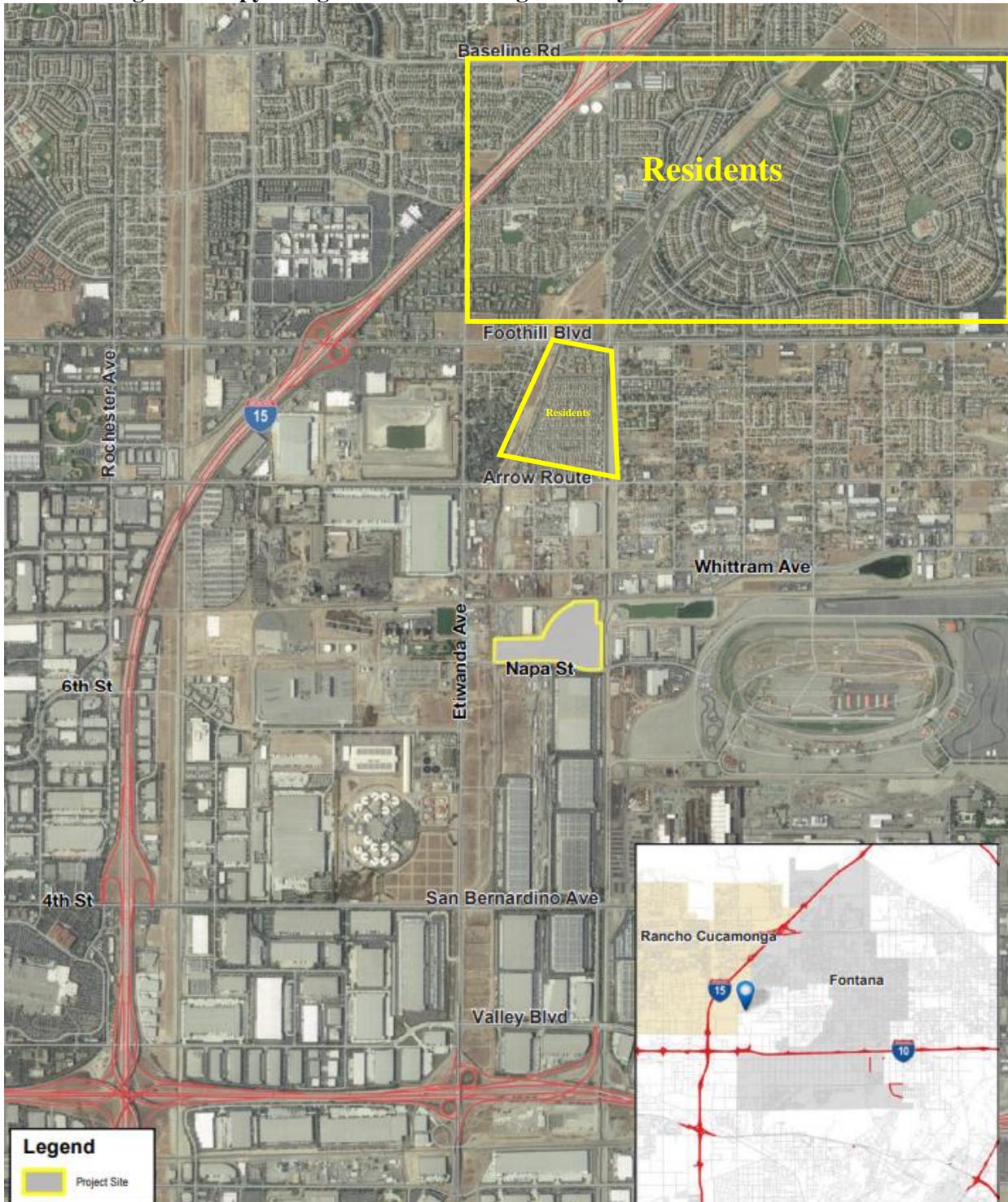
<sup>2</sup> Draft EIR. Page 4.11.

<sup>3</sup> Draft EIR. Page 1-18.

<sup>4</sup> Draft EIR. Appendix A. Modeling Data. PDF page 1128.

- Etiwanda Avenue – Interstate 10 to Fourth Street
- Etiwanda Avenue – Fourth Street to Napa Street
- Etiwanda Avenue – Napa Street to I-15

**Figure 1: Copy of Figure 4.11-1: Existing Roadway Network in the Draft EIR\***



\*South Coast AQMD staff added two polygons to indicate the location of existing residents that are located to the north of the Proposed Project. August 10, 2021.

As shown in Figure 1, Fourth Street and Napa Street are located south of the Proposed Project, and Etiwanda Avenue is located west of the Proposed Project. Trucks using these roadways will likely enter and exit the Proposed Project without a need to travel next to or near existing residential uses on Arrow Route and Foothill Boulevard that are located north of the Proposed Project. As such, South Coast AQMD staff recommends that the Lead Agency limit the truck routes to be consistent with those that are used to analyze the Proposed Project's health risk impacts and make the following revisions to Mitigation Measure AQ-6 in the Final EIR.

**Mitigation Measure AQ-6:** Post signs at every truck exit driveway providing directional information to the truck route, so that trucks will not travel on Arrow Route and Foothill Boulevard next to or near sensitive land uses (e.g., residences).

*South Coast AQMD Rule 2305 and Rule 316*

On May 7, 2021, South Coast AQMD's Governing Board adopted Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program, and Rule 316 – Fees for Rule 2305. Rules 2305 and 316 are new rules that will reduce regional and local emissions of nitrogen oxides (NOx) and particulate matter (PM), including diesel PM. These emission reductions will reduce public health impacts for communities located near warehouses from mobile sources that are associated with warehouse activities. Also, the emission reductions will help the region attain federal and state ambient air quality standards. Rule 2305 applies to owners and operators of warehouses greater than or equal to 100,000 square feet. Under Rule 2305, operators are subject to an annual WAIRE Points Compliance Obligation that is calculated based on the annual number of truck trips to the warehouse. WAIRE Points can be earned by implementing actions in a prescribed menu in Rule 2305, implementing a site-specific custom plan, or paying a mitigation fee. Warehouse owners are only required to submit limited information reports, but they can opt in to earn Points on behalf of their tenants if they so choose because certain actions to reduce emissions may be better achieved at the warehouse development phase, for instance the installation of solar and charging infrastructure. Rule 316 is a companion fee rule for Rule 2305 to allow South Coast AQMD to recover costs associated with Rule 2305 compliance activities. Since the Proposed Project consists of the development of two warehouses totaling 632,034 square feet, the Proposed Project's warehouse owners and operators will be required to comply with Rule 2305 once the warehouse is occupied. Therefore, South Coast AQMD staff recommends that the Lead Agency review South Coast AQMD Rule 2305 to determine the potential WAIRE Points Compliance Obligation for future operators and explore whether additional project requirements and CEQA mitigation measures can be identified and implemented at the Proposed Project that may help future warehouse operators meet their compliance obligation. South Coast AQMD staff is available to answer questions concerning Rule 2305 implementation and compliance by phone or email at (909) 396-3140 or [waire-program@aqmd.gov](mailto:waire-program@aqmd.gov). For implementation guidance documents and compliance and reporting tools, please visit South Coast AQMD's WAIRE Program webpage.<sup>5</sup>

### 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

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<sup>5</sup> South Coast AQMD WAIRE Program. Accessed at: <http://www.aqmd.gov/waire>.

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 the existing air quality mitigation measure are not feasible, the Lead Agency should describe the specific reasons supported by substantial evidence 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 Steve Tsumura, Air Quality Specialist, at [stsumura@aqmd.gov](mailto:stsumura@aqmd.gov) or (909) 396-2549, should you have any questions.

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

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