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SENT VIA E-MAIL:

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Draft Environmental Impact Report (EIR) for the Proposed BRE Space Center Mira Loma Logistics Project (Proposed Project) (SCH No.: 2020100565)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The City of Jurupa Valley is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. The following comments on the Draft EIR include the CEQA operational air quality impact analysis, recommended additional operational mitigation measures, and a discussion of South Coast AQMD permits that the Lead Agency should include in the Final EIR.

Based on the Draft EIR, the Proposed Project consists of demolition of 1,597,500 square feet of existing warehousing buildings, and construction and operation of two new warehousing buildings totaling 1,939,312 square feet; 341,812 square feet will be net new. The Proposed Project is located at 3401 Space Center Court on the northwest corner of Iberia Street and Space Center Court within the City of Jurupa Valley.

Construction of the Proposed Project is anticipated to begin in July 2021 and will be completed in December 2022¹. The Proposed Project will include design features such as LED lighting and drought tolerant landscaping². Once operational, the Proposed Project is anticipated to generate 3,928 trip-ends per day, 908 of which would be made by light-, medium-, and heavy-heavy-duty trucks³. Although the tenant for the Proposed Project is unknown, the Proposed Project may include refrigerated logistics uses; therefore, 217 trucks are anticipated to include transportation refrigeration units (TRUs)⁴. Based on the Draft EIR, existing sensitive receptors are within 1,001 feet of the Proposed Project⁵.

Based on a review of the Draft EIR and supporting technical documents, South Coast AQMD staff has three main comments. A summary of these comments is provided as follows with additional details provided in the attachment.

1. CEQA Air Quality Impact Analysis – Operations: The Draft EIR indicates that an existing rail spur located on the northwest corner of the Proposed Project site would

¹ Draft EIR. Section 4.4 Energy. Page 4.4-7.

² *Ibid.*

³ Draft EIR. Section 4.2 Air Quality Page 4.2-41.

⁴ *Ibid.* Page 4.2-42.

⁵ *Ibid.* Page 4.2-46.

likely be used in the future for Building 2, which could reduce heavy-duty truck trip generation associated with Building 2. However, the air quality impact analysis in the Draft EIR did not account for operational emissions from rail activities. To identify the maximum mass emissions and concentrations from operation of the Proposed Project, South Coast AQMD staff recommends that the Lead Agency revise the operational air quality impact analysis in the Final EIR to include emissions from rail activities. Alternatively, if emissions from rail activities are not included in the Final EIR, the Lead Agency should provide reasons for not including them supported by substantial evidence in the record.

2. Additional Recommended Air Quality Mitigation Measures: CEQA requires that the Lead Agency considers all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse air quality impacts. South Coast AQMD staff recommends the Lead Agency include additional mitigation measures to require the use of the cleanest technologies at the existing rail spur before the Proposed Project is allowed to use it during operation, require the use of cleaner trucks, and incorporate design features to further reduce the Proposed Project's significant and unavoidable operational air quality impacts from NOx emissions and associated exposures.
3. Responsible Agency and South Coast AQMD Permits: If the Proposed Project will require the use of stationary equipment such as emergency generator(s) and fire pump(s), permit(s) from South Coast AQMD will be required. Therefore, South Coast AQMD staff recommends the Lead Agency identify stationary equipment that will be required during operation and identify South Coast AQMD as a CEQA Responsible Agency for the Proposed Project in the Final EIR.

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, Air Quality Specialist, at amullins@aqmd.gov, should you have any questions or wish to discuss the comments.

Sincerely,

Lijin Sun

Lijin Sun

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment
LS:AM
RVC210928-08
Control Number

ATTACHMENT**South Coast AQMD Staff's Summary of Air Quality Analysis and Health Risk Assessment in the Draft EIR**

In the Air Quality Analysis Section of the Draft EIR, the Lead Agency quantified the Proposed Project's maximum daily construction and operational emissions. Construction emissions included demolition and hauling of 1,570,000 square feet of existing buildings⁶. The Lead Agency compared the Proposed Project's construction and operational emissions to the respective South Coast AQMD's recommended regional 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 with an estimated 151 pounds per day (lbs/day) of NOx emissions⁷, which is above South Coast AQMD's CEQA significance threshold for regional construction NOx emissions at 100 lbs/day. Mitigation Measures (MMs) 4.2-1 and 4.2-2 would require the use of Tier 4 or equivalent construction equipment and anti-idling signage during construction activities. With implementation of these mitigation measures, regional construction NOx emissions were reduced to less than significant at 46 lbs/day⁸.

The Lead Agency also found that that the Proposed Project's regional operational air quality impacts would be significant with an estimated 123 lbs/day of net new NOx emissions, which would exceed South Coast AQMD's CEQA significance threshold for regional operational NOx emissions at 55 lbs/day⁹. Implementation of MMs 4.2-2 to 4.2-6 would require future tenants be provided information about funding opportunities for clean equipment and engines, installation of conduit tractor trailer parking areas for future electric (EV) truck charging, plug-in capabilities for TRUs at loading bays, and non-diesel outdoor cargo handling equipment. However, the Lead Agency found that operation of the Proposed Project would still result in significant and unavoidable air quality impacts with NOx emissions at 123 lbs/day¹⁰.

In the Draft EIR, the Lead Agency also quantified the Proposed Project's localized construction and operational emissions and compared them to the applicable South Coast AQMD's localized significance thresholds. Based on the analysis, the Lead Agency found that the Proposed Project's localized construction and operational air quality impacts would be less than significant¹¹. Additionally, the Lead Agency calculated cancer risks from Proposed Project's construction and operational activities and found that they would result in a cancer inhalation risk of 1.9 in one million and 1.98 in one million¹², respectively, both of which would not exceed South Coast AQMD's CEQA significance threshold of 10 in one million for cancer risk¹³. Finally, the Lead Agency discussed South Coast AQMD Rules 2305 and 316¹⁴.

⁶ Draft EIR. Chapter 3 Project Description. Page 3-11.

⁷ Draft EIR. Section 4.2 Air Quality. Page 4.2-40.

⁸ *Ibid.* Page 4.2-44.

⁹ *Ibid.* Page 4.2-43.

¹⁰ *Ibid.*

¹¹ *Ibid.* Pages 4.2-45 to 4.2-46.

¹² *Ibid.* Pages 4.2-46 to 4.2-49.

¹³ South Coast AQMD's CEQA significance threshold of 10 in one million for cancer risk is based on the most current methodology recommended by the California Office of Environmental Health Hazard assessment.

¹⁴ Draft EIR. Section 4.2 Air Quality. Page 4.2-29.

South Coast AQMD staff's detailed comments on the Draft EIR is provided as follows.

1. CEQA Air Quality Impacts Analysis - Operations

In the Draft EIR, the Lead Agency identified that an existing rail spur is located on the northwest corner of the Proposed Project site¹⁵. The Lead Agency explained that, “[n]o trip reductions were taken for the rail spur, however, use of the rail spur in the future would likely reduce heavy truck trip generation associated with Building 2”¹⁶. However, the air quality impact analysis in the Draft EIR did not calculate emissions from operational rail activities that are likely to occur during operation of the Proposed Project. To properly analyze the Proposed Project's operational air quality impacts from all future activities that are reasonably foreseeable at the time of the release of the Draft EIR, South Coast AQMD staff recommends that the Lead Agency quantify mass emissions and air concentrations from operational rail activities¹⁷ in the Final EIR. Alternatively, if emissions from rail activities are not included in the Final EIR, the Lead Agency should provide reasons for not including them supported by substantial evidence in the record.

2. Additional Recommended Air Quality Mitigation Measures

In the Draft EIR, the Lead Agency found that the Proposed Project would result in significant and unavoidable air quality impacts from NOx emissions during operation and that the existing rail spur would likely be used associated with operation of Building 2 of the Proposed Project. CEQA requires that the Lead Agency consider mitigation measures to minimize significant adverse impacts (CEQA Guidelines Section 15126.4) and that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse impacts. South Coast AQMD staff recommends that the Lead Agency consider including the following operational mitigation measures in the Final EIR to reduce the Proposed Project's operational NOx emissions from rail activities and mobile sources that will be attracted to the Proposed Project during operation.

Mitigation measure for operational air quality impacts from rail activities that the Lead Agency should consider in the Final EIR may include the following:

- Include a condition allowing the usage of the existing rail spur during operation if the use of the cleanest technologies for locomotives (line-haul and switcher) and cargo handling equipment, including, but is not limited to, yard trucks and electric-powered, rail-mounted gantry cranes rather than diesel-powered, rubber-tired gantry cranes (RTGs) can be demonstrated supported by evidence.

Mitigation measures for operational air quality impacts from mobile sources that the Lead Agency should consider in the Final EIR may include the following:

- Require the use of zero-emissions (ZE) or near-zero emission (NZE) on-road trucks during operation such as heavy-duty trucks with natural gas engines that meet the CARB's adopted optional NOx emissions standard at 0.02 grams per brake horsepower-

¹⁵ Draft EIR. Chapter 3 Project Description. Page 3-10.

¹⁶ *Ibid.*

¹⁷ South Coast AQMD Modeling Guidance for AERMOD. Accessed at: <http://www.aqmd.gov/home/air-quality/meteorological-data/modeling-guidance#Receptor>.

hour (g/bhp-hr), if and when feasible. Given the state's clean truck rules and regulations aiming to accelerate the utilization and market penetration of ZE and NZE trucks such as the Advanced Clean Trucks Rule¹⁸ and the Heavy-Duty Low NOx Omnibus Regulation¹⁹, ZE and NZE trucks will become increasingly more available to use, especially during the operational lifetime of the Proposed Project, which begins in 2022. The Lead Agency should require a phase-in schedule to incentive the use of these cleaner operating trucks to reduce any significant adverse air quality impacts during operation. South Coast AQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency. Include these truck requirements in applicable bid documents, purchase orders, and contracts. Operators shall maintain records of all trucks associated with project construction to document that each truck used meets these emission standards, and make the records available for inspection.

- In the Draft EIR, the Lead Agency explains that the Proposed Project will require the use of non-diesel-fueled cargo handling equipment²⁰. Cargo handling equipment (e.g., yard trucks and forklifts) with ZE technologies are commercially available today and should be required for use during operation of the Proposed Project.
- Limit the daily number of trucks allowed at the Proposed Project to levels analyzed in the Final EIR. If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the Proposed Project through CEQA prior to allowing a higher activity level.

Design considerations for the Proposed Project that the Lead Agency should consider to further reduce air quality and health risk impacts include the following:

- In the Draft EIR, the Lead Agency explains that the City of Jurupa Valley has restricted truck access on Etiwanda Avenue between the 60 Freeway and Hopkins Street.²¹ South Coast AQMD staff recommends that the Lead Agency clearly mark truck routes with trailblazer signs to ensure truck travel avoids traversing south on Etiwanda Avenue to the 60 Freeway, where there is an existing residential land use.
- Restrict overnight truck parking in sensitive land uses by providing overnight truck parking inside the Proposed Project site.

3. Responsible Agency and South Coast AQMD Permits

If implementation of the Proposed Project requires the use of stationary equipment, including but is not limited to, emergency generator(s) and emergency fire pump(s), permits from South Coast AQMD are required. The Final EIR should include a discussion on stationary equipment that

¹⁸ CARB. June 25, 2020. *Advanced Clean Trucks Rule*. Accessed at: <https://ww2.arb.ca.gov/our-work/programs/advanced-clean-trucks>.

¹⁹ CARB has recently passed a variety of new regulations that require new, cleaner heavy-duty truck technology to be sold and used in state. For example, on August 27, 2020, CARB approved the Heavy-Duty Low NOx Omnibus Regulation, which will require all trucks to meet the adopted emission standard of 0.05 g/hp-hr starting with engine model year 2024. Accessed at: <https://ww2.arb.ca.gov/rulemaking/2020/hdomnibuslownox>.

²⁰ Draft EIR. Section 4.2 Air Quality. Page 4.2-39.

²¹ Draft EIR. Appendix S Traffic Analysis. Page 31.

will require South Coast AQMD permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project. Any assumptions used in the Final EIR will be used as the basis for permit conditions and limits for the Proposed Project. The 2015 revised Office of Environmental Health Hazard Assessment (OEHHA) methodology is being used by South Coast AQMD for determining operational health risks for permitting applications and also for all CEQA projects where South Coast AQMD is the Lead Agency. Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions on permits. For more general information on permits, please visit South Coast AQMD's webpage at: <http://www.aqmd.gov/home/permits>.

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 supported by substantial evidence for rejecting them in the Final EIR (CEQA Guidelines Section 15091).