



## South Coast Air Quality Management District

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### **Review of the Draft Environmental Impact Report (Draft EIR) for the Renaissance Specific Plan Project**

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the Draft Environmental Impact Report (draft EIR) for the Renaissance Specific Plan. The aforementioned document was originally circulated for public comment from May 3, 2010 through June 16 2010; however, AQMD staff did not receive the draft EIR for review until September 2, 2010. Pursuant to Section 15087 of the CEQA Guidelines we request that the lead agency provide AQMD staff sufficient notice of any future projects subject to 2100 et. sq. of the Public Resources Code. The following comments are intended to provide guidance to the lead agency and should be incorporated into the revised Draft or Final Environmental Impact Report (Draft or Final EIR) as appropriate.

AQMD staff is concerned about the significant regional construction and operational air quality impacts from the proposed project. Also, AQMD staff is concerned about the placement of sensitive receptors (i.e., residences, schools, hospitals, nursing homes, day care centers, parks and playgrounds) in close proximity to sources of diesel particulate matter (DPM) and toxic air contaminant (TAC) emissions. For example, the proposed project places the Business Center land use designation adjacent to residential, park and school designations. Further, the proposed project places the Town Center land use designation that could include day care centers adjacent to the 210 Freeway. Also, AQMD staff is concerned that the emissions calculations and assumptions used to calculate the project's potential localized air quality impacts and health risk impacts may result in underestimated air quality impacts. Therefore, AQMD staff strongly recommends that the lead agency incorporate additional mitigation measures given the

significant air quality impacts already determined for this project and the potential for more air quality impacts upon revision of this analysis.

Pursuant to Public Resources Code Section 21092.5, please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. Further, staff is available to work with the lead agency to address these air quality issues and any other questions that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,



Ed Eckerle  
Program Supervisor  
Planning, Rule Development & Area Sources

Attachment

EE:DG

SBC100902-01  
Control Number

### Localized Air Quality and Health Risk Impacts Mitigation

1. On page 4.3-38 the lead agency concluded that in light of uncertainties in land use intensity and placement at the project site the potential health risk impacts from diesel particulate matter (DPM) and toxic air contaminant (TAC) emissions to future occupants of the proposed project are less than significant. The lead agency indicates that this significance determination is based on five criteria including less than significant air quality impacts derived from a localized significance threshold (LST) analysis, a CO Hotspot Analysis, mitigation measures (i.e., AQ-13 and AQ-AQ14) consistent with guidelines in the CARB Handbook and California school siting requirements. However, AQMD staff is concerned that these mitigation measures do not address all sensitive land uses in the proposed project.

Specifically, AQMD staff is concerned that the lead agency did not address day care centers allowed by the Town Center land use designation in close proximity (i.e., less than 100 feet) to the 210 Freeway. Therefore, AQMD staff recommends that the lead agency provide additional mitigation that prohibits the placement of day care centers within 500 feet of the 210 Freeway. Further, AQMD staff notes that the lead agency does not include daycare centers, parks and playgrounds in mitigation measures AQ-13 and AQ-14. As a result, consistent with the CARB Handbook the AQMD staff recommends that the lead agency revise mitigation measures AQ-13 and AQ-14 to include all sensitive land uses:

- AQ-13 The following uses shall not be located within the distance specified from an existing or future sensitive receptor (residence, school, hospital, nursing home, day care centers, parks and playgrounds): within 500 feet of the 210 Freeway; within 500 feet of the equipment within a dry cleaning facility utilizing Perchloroethylene; and within 300 feet of a fueling station facility (i.e. fuel pumps). These facilities may be located closer than the proscribed distances if a project-specific health risk assessment is performed that demonstrates that the project-specific health risk impacts do not exceed the SCAQMD's health risk significance thresholds.
- AQ-14 The following uses shall not be located within 1000 feet of a nearby sensitive receptor (occupied portions of existing or future residences, schools, hospitals, nursing homes, day care centers, parks, and playgrounds): a warehouse, distribution center, or logistics center unless a project-specific health risk assessment is performed that demonstrates that the project-specific health risk impacts do not exceed the SCAQMD's health risk significance thresholds.

### Regional Construction Air Quality Mitigation Measures

2. Given that the lead agency's regional construction air quality analysis demonstrates that criteria pollutant emissions from the project exceed the AQMD's daily significance threshold for VOC, NOx, CO, PM10 and PM2.5 the AQMD staff recommends that the lead agency replace mitigation measure AQ-09 with measures

that other lead agencies in the region (including Port of Los Angeles and Port of Long Beach) have enacted to further reduce air quality impacts from the project, if feasible:

- ❖ April 1, 2010, to December 31, 2011: All offroad diesel-powered construction equipment greater than 50 hp shall meet Tier 2 offroad emissions standards. In addition, all construction equipment shall be outfitted with the BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 2 or Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
- ❖ January 1, 2012, to December 31, 2014: All offroad diesel-powered construction equipment greater than 50 hp shall meet Tier 3 offroad emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
- ❖ Post-January 1, 2015: All offroad diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
- ❖ A copy of each unit's certified tier specification, BACT documentation, and CARB or AQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.

For additional measures to reduce off-road construction equipment, refer to the mitigation measure tables located at the following website:

[www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html).

Warehouse/Distribution Center Operational Mitigation Measures:

3. Given that the lead agency's regional operational air quality analysis demonstrates that criteria pollutant emissions from the project exceed the AQMD's daily significance threshold for VOC, NO<sub>x</sub>, CO, PM<sub>10</sub> and PM<sub>2.5</sub> the AQMD staff recommends that the lead agency consider adding the following mitigation measures to reduce air quality and potential future health risk impacts from the operation phase of the proposed project, if feasible:
  - ❖ Restrict truck activity at the project site during periods of heavy use at the park, such as weekends.

- ❖ Design warehouse/distribution centers such that entrances and exits discourage that trucks from traversing past neighbors or other sensitive receptors.
- ❖ Design warehouse/distribution centers such that any check-in point for trucks is well inside the facility property to ensure that there are no trucks queuing outside of the facility.
- ❖ Develop, adopt and enforce truck routes both for entering and leaving the city and in and out of facilities; keeping in mind common pedestrian routes, especially for schools.
- ❖ Establish area(s) within the facility for repair needs.
- ❖ Have truck routes clearly marked with trailblazer signs, so trucks will not enter residential areas.
- ❖ Identify or develop secure locations outside of residential neighborhoods where truckers that live in the community can park their truck, such as a Park & Ride.
- ❖ Provide food options, fueling, truck repair and/or convenience stores on warehouse/distribution center sites to minimize the need for trucks to traverse through residential neighborhoods.
- ❖ Re-route truck traffic by adding direct off-ramps for the truck or by restricting truck traffic on certain sensitive routes.
- ❖ Improve traffic flow by signal synchronization.
- ❖ Require or provide incentives for diesel particulate traps that meet CARB certified level 3 requirements.
- ❖ Electrify service equipment at facilities.

#### Localized Significance Threshold Calculations

4. According to Table 11 on page 46, the maximum emissions are 650 lbs/day for NO<sub>x</sub> and 996 lbs/day for CO. However, in Appendix B (Renaissance Phase 1\_LSTConstruction Calculations.xls), the emissions used in the calculations are 239 lbs/day for NO<sub>x</sub> and 115 lbs/day for CO, which is less than the emissions in Table 11. Therefore, the localized impacts from both NO<sub>x</sub> and CO may be underestimated.

#### Potential Additional Receptors for Localized Air Quality Impacts

5. The lead agency did not sufficiently analyze air quality impacts to all potential receptors. Given that the project will be constructed in several phases, it is possible that the operational phases are considered receptors during construction of the subsequent phases (i.e. Phase 1 would be considered as receptors for Phase 2 construction). Therefore, AQMD staff recommends that the lead agency analyze the potential localized air quality impacts to all potential receptors.

#### Area of Source Modeled for Health Risk Assessment

6. On page 59, the area sources modeled are described as a 125-meter square centered over the existing airport. This would represent a source of 3.86 acres, which is not consistent with the source that was modeled. Therefore, AQMD staff requests that the lead agency model the correct source. Furthermore, in order to conservatively model the project's impacts, it would be more appropriate to place the source at the edge of the construction area, upwind of the nearest sensitive receptor.

#### Land Use Assumptions for Health Risk Assessment

7. Although the specific plan describes the various allowed land uses, it is not possible to know what exact uses will be built. For example, according to Table 3-2, Page 3-3 of the specific plan, warehouses are allowed in areas designated as employment (EMP) and business center (BC), which accounts for almost 50% of the Renaissance Specific Plan. Also, there are residential units proposed to the northeast of the possible warehouses, which places these sensitive receptors downwind of the warehouses. Further, it is impossible to determine the actual percentage of the EMP and BC land uses that were analyzed as warehouse type sources. Therefore, AQMD staff is concerned that an underestimate in the amount of warehousing that is placed in the proposed project could lead to a miscalculation in the cancer risk impacts to existing and future residences from diesel PM.

Given the uncertainty in actual land uses for the proposed specific plan the AQMD staff recommends that the lead agency carefully examine all future projects within the specific plan area and if potential significant impacts are identified (e.g., a health risk assessment identifies a risk greater than one in one hundred thousand), the lead agency should prepare the necessary CEQA document pursuant to the Public Resources Code 15168(c). Also, AQMD staff requests that pursuant to Section 15168(e) the lead agency place the AQMD on future notices of activity.