



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL AND USPS:  
sgonzales@ci.colton.ca.us

April 14, 2015

Mr. Steve Gonzales, Associate Planner  
Development Services, Planning Division  
City of Colton  
659 N. La Cadena Drive  
Colton, CA 92324

## **Draft Supplemental Environmental Impact Report (DSEIR) for the Proposed Agua Mansa Logistics Center With New Building 1**

The South Coast Air Quality Management District (SCAQMD) 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 CEQA document.

In the DSEIR, the Lead Agency proposes construction and operation of a new speculative warehouse distribution facility (the proposed New Building 1) on a 21.07 acre site. Building 1 will be approximately 447,330 total square feet in size and include 435,330 square feet of warehouse building space with 12,000 square feet of office use. The proposed project is associated with a previously certified Agua Mansa Commerce Center Environmental Impact Report. The proposed project will result in an increase to the overall commerce center plan of approximately 13.2 acres in total acreage and a decrease in total square footage by approximately 19,017 square feet. The air quality analysis assumed two years for construction for Building 1 with opening year scheduled for 2017.

In the DSEIR, the Lead Agency has determined that project operational criteria pollutant emissions will remain significant and unavoidable after mitigation is incorporated. Pursuant to CEQA Guidelines §15126.4, SCAQMD staff therefore recommends that additional mitigation measures be incorporated into the Final CEQA document in order to minimize significant impacts. Details are included in the attachment.

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final CEQA document. The SCAQMD staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Mr. Steve Gonzales,  
Associate Planner

2

April 14, 2015

Sincerely,

*Jillian Wong*

Jillian Wong, Ph.D.  
Program Supervisor, Inter-Governmental Review  
Planning, Rule Development & Area Sources

Attachment

JW:GM

SBC150310-11  
Control Number

### **Mitigation Measures for Operational Air Quality Impacts (Mobile Sources)**

1. Based on the Lead Agency's estimates, NO<sub>x</sub> emissions will increase between 156-164 pounds per day, mostly from mobile source emissions related to on-road vehicle trips associated with the proposed project. In addition to the measures proposed by the Lead Agency starting on page 4.2-21 in the Air Quality Section of the DSEIR, the SCAQMD staff recommends that the following transportation related mitigation measures should be incorporated in the Final SEIR in order to reduce the project's significant air quality impacts.
  - a. Limit the daily number of trucks allowed at each facility to levels analyzed in the Final SEIR. If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the project through CEQA prior to allowing this higher activity level;
  - b. Require the use of 2010 compliant diesel trucks, or alternatively fueled, delivery trucks (e.g., food, retail and vendor supply delivery trucks) at commercial/retail sites upon project build-out. If this isn't feasible, consider other measures such as incentives, phase-in schedules for clean trucks, etc.;
  - c. Have truck routes clearly marked with trailblazer signs, so that trucks will not enter residential areas;
  - d. Re-Route truck traffic by restricting truck traffic on certain sensitive routes;
  - e. Develop, adopt and enforce truck routes both in and out of city, and in and out of facilities;
  - f. Prohibit all vehicles from idling in excess of five minutes, both on- and off-site;
  - g. Improve traffic flow by signal synchronization; and
  - h. Provide electric vehicle (EV) Charging Stations (see the discussion below regarding EV charging stations).

### **Alternative Fueled Truck Phase-In Schedule**

2. Since the proposed project generates significant regional emissions, the Lead Agency should require mitigation that requires accelerated phase-in for non-diesel powered trucks. For example, natural gas trucks, including Class 8 HHD trucks, are commercially available today. Natural gas trucks can provide a substantial reduction in health risks, and may be more financially feasible today due to reduced fuel costs compared to diesel. In the Final CEQA document, the Lead Agency should require a phase-in schedule for these cleaner operating trucks to reduce project impacts. SCAQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency and project applicant.

### **Electric Vehicle (EV) Charging Stations**

3. Trucks that can operate at least partially on electricity have the ability to substantially reduce the significant NOx impacts from this project. Further, trucks that run at least partially on electricity are projected to become available during the life of the project as discussed in the 2012 Regional Transportation Plan. It is important to make this electrical infrastructure available when the project is built so that it is ready when this technology becomes commercially available. The cost of installing electrical charging equipment onsite is significantly cheaper if completed when the project is built compared to retrofitting an existing building. Therefore, the SCAQMD staff recommends the Lead Agency require the proposed warehouse and other plan areas that allow truck parking to be constructed with the appropriate infrastructure to facilitate sufficient electric charging for trucks to plug-in. Similar to the City of Los Angeles requirements for all new projects, the SCAQMD staff recommends that the Lead Agency require at least 5% of all vehicle parking spaces (including for trucks) include EV charging stations<sup>1</sup>. Further, electrical hookups should be provided at the onsite truck stop for truckers to plug in any onboard auxiliary equipment. At a minimum, electrical panels should appropriately sized to allow for future expanded use.

### **CNG Fueling Station and Convenience Site**

4. Because the proposed project will generate significant regional NOx operational impacts, the SCAQMD staff recommends that the project pro-actively take measures that could reduce emissions sooner rather than later. The SCAQMD staff therefore recommends that the Lead Agency ensure the availability of alternative fueling facility (e.g., natural gas) to serve the project site prior to operation of any logistics warehousing within the project area.

### **Mitigation Measures for Operational Air Quality Impacts (Other Area Sources)**

5. In addition to the mobile source mitigation measures identified above, the Lead Agency should incorporate the following onsite area source mitigation measures below to reduce the project's significant regional air quality impacts from NOx emissions during operation. These mitigation measure should be incorporated pursuant to CEQA Guidelines §15126.4
  - a. Maximize use of solar energy including solar panels; installing the maximum possible number of solar energy arrays on the building roofs and/or on the Project site to generate solar energy for the facility.
  - b. Require all lighting fixtures, including signage, to be state-of-the art and energy efficient, and require that new traffic signals have light-emitting diode (LED) bulbs and require that light fixtures be energy efficient compact fluorescent and/or LED light bulbs. Where feasible use solar powered lighting.

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<sup>1</sup>[http://ladbs.org/LADBSWeb/LADBS\\_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf](http://ladbs.org/LADBSWeb/LADBS_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf)

- c. Utilize only Energy Star heating, cooling, and lighting devices, and appliances.
- d. Limit the use of outdoor lighting to only that needed for safety and security purposes.
- e. Require use of electric or alternatively fueled sweepers with HEPA filters.