



South Coast
Air Quality Management District
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August 21, 2015

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8353 Sierra Avenue
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Draft Environmental Impact Report (DEIR) for the
Proposed Slover Avenue Distribution Center

The South Coast Air Quality Management District (SCAQMD) 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.

The proposed project is for the construction of a concrete tilt-up logistics warehouse building totaling approximately 671,324 square feet on approximately 30.79 acres. Based on recommended guidance from the Institute of Transportation Engineers (ITE)¹, the proposed project could have as many 1,128 total daily vehicle trips, which includes 430 truck trips. In the Air Quality Section, the lead agency quantified the project's construction and operation air quality impacts and has compared those impacts with the SCAQMD's recommended regional and localized daily significance thresholds. According to the analysis, the lead agency has determined that construction and operational air quality impacts will exceed the recommended regional daily significance threshold for NOx. The analysis concluded that construction NOx emissions will be mitigated to less than significant while operational emissions will remain significant and unavoidable.

SCAQMD staff is concerned about the significant adverse long-term air quality impacts estimated in the DEIR and therefore, requests the lead agency to incorporate some changes to some of the proposed mitigation measures. In addition, SCAQMD staff recommends that all feasible mitigation measures be incorporated into the final project and Final EIR to reduce these impacts, to the fullest extent feasible. The recommended mitigation measures are included in the attachment.

¹ ITE, 9th Edition, Land Use 152 High-Cube Warehouse/Distribution Center 152, Weekday Weighted Average Truck Trip Generation Rate of 0.64 trip ends per 1,000 square feet.

Pursuant to Public Resources Code Section 21092.5, SCAQMD staff requests that the lead agency provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final EIR. Further, SCAQMD staff is available to work with the lead agency to address the issues raised in this letter and any other questions that may arise. Please contact Jack Cheng, Air Quality Specialist, at (909) 396-2448, if you have any questions regarding this comment letter.

Sincerely,

Barbara Radlein

Barbara Radlein
Program Supervisor
Planning, Rule Development & Area Sources

Attachment
BR:JC
SBC150708-01
Control Number

Attachment

Mitigation Measures for Construction Air Quality Impacts

During construction, the lead agency has determined that project operation emissions are significant for NO_x, primarily from off-road diesel-powered construction equipment. Because the California Air Resources Board has classified the particulate portion of diesel exhaust emissions as carcinogenic, the SCAQMD staff recommends the following changes to MM 4.1-5. Additionally, MM4.1-1 is inconsistent with SCAQMD Rule 1113 and should be updated accordingly.

Recommended Changes:

MM 4.1-5: a) ~~The contractor shall utilize off road diesel powered construction equipment (greater than or equal to 150 horsepower) certified California Air Resources Board (CARB) Tier 3 or better. All off-road 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.

MM 4.1-1: All surface coatings shall consist of Zero-Volatile Organic Compound paints (no more than ~~150~~ 50 gram/liter of VOC) and/or be applied with ~~High Pressure Low Volume (HPLV)~~ High Volume Low Pressure (HVLP) consistent with SCAQMD Rule 1113.

Mitigation Measures for Operational Air Quality Impacts (Mobile Sources)

During project operations, the lead agency has determined that project operation emissions are significant for VOC and NO_x, primarily from truck emissions. Because the California Air Resources Board has classified the particulate portion of diesel exhaust emissions as carcinogenic, the SCAQMD staff recommends the following changes to MM 4.1-14 and proposes the inclusion of additional mitigation measures to be incorporated in the Final EIR to reduce exposure to sensitive receptors and reduce potential significant project air quality impacts:

Recommended Changes:

MM 4.1-14: Prior to the issuance of occupancy permits, the Project's property owner shall provide documentation to the City of Fontana Community Development Department verifying that provisions are included in the building's lease agreement that require tenants to use ~~1) electric or natural gas powered forklifts. and 2) diesel powered on-site operating vehicles that meet 2010 engine standards or better.~~

Additional Mitigation Measures for Operational Air Quality Impacts

Recommended Mitigation Measures For Mobile Sources:

- Limit the daily number of trucks allowed at each facility 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 project through CEQA prior to allowing this higher activity level.
- Provide food options, fueling, truck repair and or convenience stores on-site to minimize the need for trucks to traverse through residential neighborhoods.
- Improve traffic flow by signal synchronization.
- Should the proposed project generate 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 heavy heavy duty (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 EIR, the lead agency should include a phase-in schedule to require the use of 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.

Recommended Mitigation Measures for Electric Vehicle (EV) Charging Stations:

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 five percent of all vehicle parking spaces (including for trucks) include EV charging stations (See bullet item below for suggested language)². 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.

- The Applicant shall provide a minimum of eighteen (five percent of 356 parking spaces including trucks) electric vehicle charging stations.

² http://ladbs.org/LADBSWeb/LADBS_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf