



# South Coast Air Quality Management District

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SENT VIA USPS AND E-MAIL:

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## **Draft Environmental Impact Report (Draft EIR) for the Proposed Watson Industrial Park (SCH NO. 2014041001)**

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.

The Lead Agency proposes development of eight industrial buildings totaling approximately 3,872,000 square feet with building sizes ranging from 292,000 to 750,000 square feet on a 211.9-acre site. The occupants are not known at this time but the planned uses include industrial, warehouse distribution, manufacturing, e-commerce and similar uses. The proposed project could generate a total of approximately 6,535 daily trips including approximately 2,489 daily truck trips operating to and from the site. The projected truck fleet is planned to include approximately 25 percent trucks using transport refrigeration units; approximately 312 of the total daily estimate of 1,247 trucks. Approximately 430,000 cubic yards of cut and 580,000 cubic yards of fill is planned along with about 150,000 cubic yards of soil import required during site preparation. Construction of the project will occur in three phases: 1) Phase One (Buildings 7 & 8) will begin in January 2016 and be completed at the end of 2016; 2) Phase Two (Buildings 4, 5 & 6) is planned to start in December 2016 and be completed at the end of 2017; and 3) Phase Three (Buildings 9, 10, & 11) is planned to start December 2017 and be completed at the end of 2018. Based on the projected occupancy starting in January 2017, construction and operational air quality impacts will overlap starting in January 2017 until project buildout at the end of 2018. Significant project construction, operational and health affect impacts were estimated by the Lead Agency in the Draft EIR.

The SCAQMD staff recommends that overlapping construction and operational air quality impacts starting in 2017 through project buildout in 2018 be estimated, compared with the recommended SCAQMD long-term operational thresholds of significance, and then included in the FEIR. Based on SCAQMD staff review, Phase Three construction

air quality impacts will overlap with the operational emissions generated from occupancy during Phases One and Two resulting in a new significant impact for CO<sup>1</sup>.

The SCAQMD staff also has concerns about the assumptions used in the localized significance threshold modeling and health risk assessment estimates. Finally, because the Lead Agency has determined that project air quality impacts exceed the SCAQMD recommended daily significance thresholds during construction and operations, the SCAQMD recommends additional mitigation measures in addition to the measures proposed by the Lead Agency in the Draft EIR. Details are included in the attachment.

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 adoption of the FEIR. Further, 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 the enclosed comments.

Sincerely,

*Jillian Wong*

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JW:JC:GM

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<sup>1</sup> 1) Phase 2 Construction Emissions plus Phase 1 Operational Emissions (no change in significance determinations), and 2) Phase 3 Construction Emissions plus Phases 1 & 2 Operational Emissions: CO would exceed the operational significance threshold resulting in a new significant impact. Individually, construction and operational CO impacts for these separate activities (Ph 3 construction, Table 4.3-18, and Phases 1 & 2 operations, Table 4.3-20) were shown as less than significant. Combined, CO impacts are significant.

## **Air Quality Analysis**

### **Overlapping Construction and Operation Activities**

1. In the Draft EIR, project construction is planned to start in 2016 with project occupancies anticipated to begin in January 2017 reaching buildout in 2018.<sup>2</sup> Construction activities would occur for up to three years with the project being built out in phases.<sup>3</sup> That would create the situation with on-going construction continuing while portions of the project becoming operational causing construction and operation air quality impacts to overlap. If construction and operational phases will overlap, the construction activity could contribute more PM10 fugitive dust emissions to the combined total emissions with the remaining emissions, i.e., NO<sub>x</sub>, CO, SO<sub>x</sub> and PM10 (exhaust) sources being contributed from both short and long term activities substantially increasing total project emissions. The SCAQMD staff therefore recommends that the Lead Agency determine the worst-case construction and operational daily air quality impact scenario; total the construction and operational emission estimates together; and then compare those totals with the SCAQMD operational daily significance thresholds in the FEIR.

### **Localized Significance Thresholds and Health Risk Assessment Analyses**

2. Receptor locations should be placed at the boundaries of the residential, worker, or school property and not the structure. Placing receptors in the center of the structures underestimates cancer impacts to the occupants. SCAQMD staff recommends that the lead agency revise the model using appropriate receptor grids and locations.
3. The HRA did not analyze the zoned residential area located east of the project site on the northeast corner of Archibald Avenue and Remington Avenue. SCAQMD staff recommends that the lead agency revise the HRA using a receptor grid over the existing residences and areas zoned or planned for residential development, in order to ensure that the maximum impacts to a residential receptor are properly analyzed.
4. All “on-site travel sources” (P1.5, P1.6, P2.6, P2.7, etc.) should extend to and from the ingress and egress of the project site. By not extending the “on-site travel” sources, emissions are underestimated. SCAQMD staff recommends that the lead agency revise the model using appropriate source placement.
5. The lead agency uses three point sources (STCK1, STCK2, STCK3, etc.) to model Transport Refrigeration Unit (TRU) Idling emissions in each docking area. Modeling TRU Idling as point sources would reduce concentrations closer to the source and elevate concentrations further away from the sources. Diesel PM concentrations at receptor locations closest to the site would be underestimated. SCAQMD staff

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<sup>2</sup> Table 5.3-4 Project Regional Construction Emissions, Page 5.3-36 (Air Quality Section); and Page 5.20-36 (Transportation/Traffic Section).

<sup>3</sup> Project Description, Page 3.0-19.

recommends that the lead agency revise the HRA using a line volume that spans the entire docking area to ensure that impacts are properly analyzed.

6. In the HRA, the lead agency identified the various schools as “school receptors” and used a nine-year exposure duration. However, worker receptors (teachers and administrative staff, etc.) were not identified in the HRA. Worker receptors placed on school property should therefore be identified and evaluated for a 40-year exposure period in the Final EIR.
7. Line volume source SLINE6 (Archibald southbound) terminates in a residential neighborhood. SLINE6 should extend to Interstate 15 where the trucks enter the freeway. SCAQMD staff recommends that the lead agency revise the model using appropriate source placement as well additional receptor placements.

### **Mitigation Measures**

#### **Construction**

8. In the Draft EIR, the Lead Agency has determined that Project impacts exceed the SCAQMD recommended daily significance thresholds for regional construction air quality impacts for NO<sub>x</sub> and VOC Pursuant to CEQA Guidelines §15126.4, the SCAQMD staff recommends the following changes and additional following mitigation measures be incorporated into the Proposed Project FEIR to reduce project adverse air quality impacts in addition to the measures included in the Air Quality Section of the Draft EIR.

#### **Measures Directed to Reduce NO<sub>x</sub> from Construction Equipment**

##### **Recommended Changes:**

- a) Consistent with measures that lead agencies in the region (including Port of Los Angeles, Port of Long Beach, Metro and City of Los Angeles)<sup>4</sup> have enacted, require all on-site construction equipment to meet EPA Tier Certification or higher emissions standards according to the following:

MM 4.3-5 c) ~~During construction activity, all construction equipment (greater than or equal to 150 horsepower) shall be California Air Resources Board (CARB) Tier 3 Certified or better. Post-January 1, 2015: 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~~

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<sup>4</sup> For example see the Metro Green Construction Policy at:

[http://www.metro.net/projects\\_studies/sustainability/images/Green\\_Construction\\_Policy.pdf](http://www.metro.net/projects_studies/sustainability/images/Green_Construction_Policy.pdf)

what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

- b) MM 4.3-5 e) All construction-related on-road diesel-powered haul trucks shall be ~~2007 or newer model~~ or 2010 engine compliant vehicles.

**Recommended Additions:**

- c) A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment (see recommended change to MM 4.3-5 c).
- d) Encourage construction contractors to apply for SCAQMD "SOON" funds. Incentives could be provided for those construction contractors who apply for SCAQMD "SOON" funds. The "SOON" program provides funds to accelerate clean up of off-road diesel vehicles, such as heavy duty construction equipment. More information on this program can be found at the following website:  
<http://www.aqmd.gov/soon/>
- e) Reroute construction trucks away from congested streets or sensitive receptor areas.
- f) Use electricity from power poles rather than temporary diesel or gasoline power generators.

Additional mitigation measures to reduce off-road construction equipment can be located at the SCAQMD website.<sup>5</sup>

**Additional Measures Directed to Reduce VOC During Construction:**

- g) Construct or build with materials that do not require painting or use pre-painted construction materials.
- h) Use coatings and solvents with a VOC content lower than required under Rule 1113.

**Mitigation Measures - Operations**

3. Based on its Air Quality Analysis, the Lead Agency has determined that project operational emissions, primarily from truck activities, are significant for Oxides of Nitrogen (NO<sub>x</sub>), Volatile Organic Compounds (VOC), Carbon Monoxide (CO) and Particulate Matter (PM<sub>10</sub> and PM<sub>2.5</sub>). Further, the California Air Resources Board has

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<sup>5</sup> <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>

classified the particulate portion of diesel exhaust emissions as carcinogenic. The SCAQMD staff therefore recommends the following additional measures that should be incorporated in the Final EIR to reduce exposure to sensitive receptors and reduce potential significant project air quality impacts:

**Recommended Additions – Truck Activities:**

- a) Provide minimum buffer zone of 300 meters (approximately 1,000 feet) between truck traffic and sensitive receptors.
- b) 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.
- c) 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>6</sup>.

Discussion

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.

**Recommended Additions - Energy Efficiency<sup>7</sup>**

- d) In MM 4.3-9, the Lead Agency sets a goal of demonstrating that the proposed project design will exceed the California Energy Code Title 24, Part 6 energy standards by three percent (3%) at the time building permit application(s) are submitted. MM 4.3-9 includes a list of measures but the list is described as being incomplete and there is no requirement to use the items on the list. The SCAQMD staff recommends that the Lead Agency list the specific strategies in the Final EIR that will be implemented into the proposed project and incorporate these measures into the Mitigation, Monitoring and Reporting Plan. Any related emission reductions should also be incorporated into applicable air quality

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<sup>6</sup> [http://ladbs.org/LADBSWeb/LADBS\\_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf](http://ladbs.org/LADBSWeb/LADBS_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf)

<sup>7</sup> See also California Green Building Standards Code California Code of Regulations at: [http://www.ecodes.biz/ecodes\\_support/Free\\_Resources/2013California/13Green/13Green\\_main.html](http://www.ecodes.biz/ecodes_support/Free_Resources/2013California/13Green/13Green_main.html) 2013 Green Building Standards Code.

analyses the Final EIR. The SCAQMD staff recommends all of these measures be incorporated, if feasible, to reduce area source emissions as well emissions from the proposed truck activities.

- e) 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.
- f) Require all lighting fixtures, including signage, to be the most energy efficient possible, 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.
- g) Use passive heating, natural cooling, solar hot water systems, and reduced pavement.
- h) Maximize the planting of trees in landscaping and parking lots.
- i) Limit the hours of operation of outdoor lighting needed for safety and security.
- j) Require use of electric or alternatively fueled sweepers with HEPA filters.