



South Coast Air Quality Management District

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13220 Central Avenue
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Draft Environmental Impact Report (Draft EIR) **for the Proposed Kimball Business Park**

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 EIR.

The Lead Agency proposes construction and operation of approximately 1,203,050 square feet (sf) of warehouse/light industrial/business park uses on approximately 70 acre site. The project will consist of approximately 352,000 sf of High-cube warehouse/Distribution, 564,000 sf of Warehouse/Distribution, 140,500 sf of General Light Industrial, and 146,550 sf of Business Park uses. The proposed project could generate a total of approximately 6,624 daily trips including 2,068 daily truck trips operating to and from the site. The Lead Agency estimated that the projects construction impacts were less than significant after mitigation. Additionally, the Lead Agency determined that the operational air quality impacts would be significant and unavoidable. The SCAQMD staff has concerns about the assumptions used in the construction modeling as well as the significance threshold modeling and health risk assessment estimates. More details are provided in the attachment.

Since the Lead Agency has determined that project air quality impacts exceed the SCAQMD recommended daily significance thresholds during operations, the SCAQMD staff recommends additional mitigation measures to further reduce the significant operational impacts. 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 Final EIR. Further, staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Jack Cheng, Air Quality Specialist CEQA Section, at (909) 396-2448, if you have any questions regarding the attached comments.

Sincerely,

Jillian Wong

Jillian Wong, Ph.D.
Program Supervisor, CEQA
Planning, Rule Development & Area Sources

JW:JC
SBC160223-01
Control Number
Attachment

ATTACHMENT

Air Quality Analysis

1. Table 4.3-5 – Project Construction Schedule of the Draft EIR indicates that the only overlapping construction phases would be Building Construction and Architectural Coating. However, Table 4.3-8 – Maximum Daily Construction Emissions Summary and associated CalEEMod models analyzed the Paving phase overlapping with the Building Construction phase. This is inconsistent with the project construction schedule. SCAQMD staff recommends correcting the discrepancies and revising the applicable air quality analyses to support the Lead Agency’s findings.

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 Lead Agency uses six point sources (STCK1 – STCK6, 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 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.
4. 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.
5. All truck routes (Line volume source SLINE18-SLINE22) terminate in residential neighborhoods. Truck routes should extend to 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.

Changes to Mitigation Measures

SCAQMD staff recommends changes to the following mitigation measures:

- **MM AQ-1:** Only “Zero-Volatile Organic Compounds” paints (no more than 50 grams/liter of VOC) or ~~High Pressure Low Volume (HPLV)~~ High Volume Low Pressure (HVLV) applications consistent with the South Coast Air Quality management District Rule 1113 shall be used.
- **Additional Measures Directed to Reduce VOC During Construction:**
Construct or build with materials that do not require painting or use pre-painted construction materials.

Additional Mitigation Measures – Truck Activities:

Since the project’s operational impacts are significant and unavoidable, SCAQMD staff recommends the following additional mitigation measures to further reduce those impacts. 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.

- Provide minimum buffer zone of 300 meters (approximately 1,000 feet) between truck traffic and sensitive receptors.
- 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.
- 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 stations¹.

¹ http://ladbs.org/LADBSWeb/LADBS_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf