



# South Coast Air Quality Management District

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SENT VIA E-MAIL:

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December 11, 2025

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**Recirculated Draft Environmental Impact Report (Recirculated DEIR) for  
Bloomington Business Park Specific Plan Project (Proposed Project)  
(SCH No: 2020120545)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to review the above-mentioned document. The San Bernardino County is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff has provided a brief summary of the project information and prepared the following comments which are organized by topic of concern.

**Summary of Proposed Project Information in the Recirculated DEIR**

Based on the Recirculated DEIR, the Proposed Project consists of adopting and implementing the Bloomington Business Park Specific Plan, which would allow development of up to 3,235,836 square feet of industrial and business-park uses on a 213-acre site in unincorporated Bloomington. The Specific Plan area includes Planning Area A (141.4 acres), proposed for large warehouse and fulfillment-center development, and Planning Area B (71.6 acres), planned for additional light industrial uses through 2040. Two alternative Opening Year development scenarios for Planning Area A would construct between 2.1 million and 2.7 million square feet of high-cube warehouses, fulfillment centers, and trailer parking.<sup>1</sup> The Proposed Project also includes a 24-acre Upzone Site that would be redesignated from Low Density Residential to Medium Density Residential and rezoned to allow up to 480 residential units to replace lost housing capacity under Senate Bill 330. Construction could occur in phases beginning with an approximately 14-month buildout of Planning Area A. Sensitive residential receptors are located immediately adjacent to both the Specific Plan area and the Upzone Site.<sup>2</sup>

The Recirculated DEIR states that a Final EIR for the Proposed Project was originally certified in 2022 but due to a lawsuit, the San Bernardino County Superior Court required the County to set aside its approvals because the EIR was inadequate regarding the analyses of alternatives and impacts to the topics of air quality (including the Friant Ranch methodology and zero-emission truck feasibility), greenhouse gases, energy, and noise. In response, the Lead Agency prepared the 2025 Recirculated DEIR, which retained the project description and footprint from the original DEIR but which contains a revised analysis for the aforementioned issues identified by the Court.<sup>3</sup>

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<sup>1</sup> Recirculated DEIR, p. 1-3.

<sup>2</sup> Recirculated DEIR, pp. 1-4 and 1-5.

<sup>3</sup> Recirculated DEIR, pp. 1-1 and 1-2.

## South Coast AQMD Comments

### *Lack of Lead Agency Responses to Previous Comment Letters and Request for Technical Files*

South Coast AQMD previously wrote two comment letters regarding the Original DEIR dated September 29, 2021. The first comment letter was transmitted to the Lead Agency on January 19, 2021 in response to the Notice of Preparation (NOP) for the Proposed Project which was released on December 30, 2020 (referred to herein as the January 2021 NOP Comment Letter).<sup>4</sup> The second comment letter was transmitted to the Lead Agency on December 15, 2021 in response to the Original DEIR released in September 2021 (referred to herein as the December 2021 DEIR Comment Letter).<sup>5</sup> More recently in response to the NOP for the Recirculated DEIR released on November 13, 2024, South Coast AQMD wrote another comment letter on December 12, 2024 that was transmitted to the Lead Agency (referred to herein as the December 2024 Recirculated DEIR Comment Letter).<sup>6</sup> These comment letters are attached and incorporated by reference.

Upon review of the Recirculated DEIR, South Coast AQMD staff found that responses to the January 2021 NOP Comment Letter and the December 2021 DEIR Comment Letter were not included in the Final EIR. Therefore, South Coast AQMD is re-submitting both January 2021 NOP Comment Letter and the December 2021 DEIR Comment Letter and awaiting the Lead Agency's responses to these previous comments.

On November 11, 2025, South Coast AQMD staff emailed the Lead Agency's contact person listed on the Governor's Office of Land Use and Climate Innovation website ([Gina.Gibson-Williams@lus.sbcounty.gov](mailto:Gina.Gibson-Williams@lus.sbcounty.gov)) seeking to obtain a complete set of the unlocked modeling and emissions calculation files used to quantify the air quality impacts in the Recirculated DEIR including the CalEEMod input files (.csv format), emission calculation spreadsheets (Excel format), AERMOD input and output files (including the full .isc package), and any HARP or post-processing files, as applicable. However, South Coast AQMD staff did not receive a response to this request. Accordingly, South Coast AQMD staff was unable to verify the calculations upon which the analysis in the Recirculated DEIR is based. With that context in mind, the following comments reflect the lack of complete information necessary to conduct a more thorough review.

### *Recommend Conducting a Quantitative Analysis of Human Health Consequences*

According to the Recirculated DEIR to satisfy the court's direction for the Lead Agency to conduct a human health consequences analysis, a qualitative analysis of Comparative Health Impact Analysis was conducted.<sup>7</sup> However, the February 2023 Friant Community Plan Update and Friant Ranch Specific Plan Specific Plan contained a detailed quantitative analysis of Human Health

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<sup>4</sup> South Coast AQMD, January 2021 NOP Comment Letter, Available at: <https://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2021/january/SBC210105-05.pdf>

<sup>5</sup> South Coast AQMD, December 2021 DEIR Comment Letter, Available at: <https://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2021/december/SBC210928-09.pdf>

<sup>6</sup> South Coast AQMD, December 2024 NOP of the Recirculated DEIR Comment Letter, Available at: <https://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2024/december-2024/sbc241113-12-nop-bloomington-business-park-specific-plan-project.pdf>

<sup>7</sup> Recirculated DEIR, Appendix B, p.1.

Consequences Analysis,<sup>8</sup> which is evidence that this type of calculation can be performed. Therefore, the Lead Agency is recommended to review this analysis in this referenced document, perform a quantitative analysis specific to the Proposed Project, and revise the Recirculated DEIR to incorporate the results.

*Incorporating Clean-Fleet / Clean-Construction as Mitigation and Context*

Given the extent, scale and duration of the Proposed Project, the Lead Agency is recommended to evaluate the applicability of the statewide clean-fleet and clean-construction programs under development by the California Air Resources Board (CARB). These programs provide a framework for achieving substantial near-term reductions in NO<sub>x</sub>, VOC, and diesel particulate matter (DPM) emissions from on- and off-road fleets, which are the key precursors to the formation of ozone which have associated adverse health impacts. Taking full advantage of these programs would provide additional opportunities to minimize the significant effects from the Proposed Project.

CARB's California Clean Construction Program is designed to recognize and encourage off-road construction fleets that voluntarily exceed regulatory requirements by deploying cleaner-than-Tier 4 Final or zero-emission off-road equipment.<sup>9</sup> Similarly, CARB's Clean Fleet Connect<sup>10</sup> and Advanced Clean Fleets (ACF) programs support on-road fleet transitions toward zero-emission technologies.<sup>11</sup> These frameworks demonstrate that both construction and operational fleets can achieve meaningful emissions reductions through adoption of newer, cleaner equipment and zero-emission technologies. While the Recirculated DEIR analyzes construction and operational emissions, it does not fully examine the feasibility of applying these emerging statewide programs as mitigation in accordance with CEQA Guidelines Section 15126.4. These CARB programs provide substantial evidence that cleaner-than-baseline technologies are commercially emerging and will become increasingly feasible during the Proposed Project's multi-year buildout. As such, their omission results in a lost opportunity to reduce the Proposed Project's significant air quality impacts.

Because NO<sub>x</sub> and VOC emissions from construction and operational activities are major contributors to regional ozone formation, implementation of clean-construction and clean-fleet measures could directly reduce the precursor emissions most relevant to potentially adverse health outcomes evaluated under *Sierra Club v. County of Fresno (Friant Ranch)*. These measures also complement any future Friant Ranch-type analysis by reducing the Proposed Project's emission inventory before photochemical or health-impact modeling is performed, thereby reducing any potential increases in regional pollutant concentrations.

Therefore, the Lead Agency is recommended to revise the Recirculated DEIR to incorporate clean-fleet and clean-construction commitments into either the project description as part of a design feature or in mitigation measures, such as:

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<sup>8</sup> Quantitative Analysis of Human Health Consequences Analysis, Table 3.3-8, Available at:

[https://www.fresnocountyca.gov/files/sharedassets/county/v/1/vision-files/files/72347-friant-prr-deir\\_2-7-23.pdf](https://www.fresnocountyca.gov/files/sharedassets/county/v/1/vision-files/files/72347-friant-prr-deir_2-7-23.pdf)

<sup>9</sup> CARB – California Clean Construction Program. Available at: <https://ww2.arb.ca.gov/our-work/programs/california-clean-construction-program>.

<sup>10</sup> CARB – Clean Fleet Connect. Available at: <https://ww2.arb.ca.gov/our-work/programs/clean-fleet-connect>.

<sup>11</sup> CARB – Advanced Clean Fleets Program. Available at: <https://ww2.arb.ca.gov/our-work/programs/advanced-clean-fleets>.

- Require the use of cleaner than Tier 4 Final or zero-emission off-road equipment when commercially available;
- Implement phased integration of zero-emission on-road trucks consistent with CARB's ACF implementation schedule or Clean Fleet Connect guidance over the lifetime of the Proposed Project;
- Establish contract specifications which require subcontractors to utilize clean construction equipment meeting CARB-recognized standards; and
- Require annual reporting or verification mechanisms to ensure compliance.

Incorporating these commitments would not only reduce NO<sub>x</sub>, VOC, and DPM emissions, but also align the Proposed Project with CARB's long-term clean-fleet transition strategy and California's climate mandates. Incorporating these commitments into the Final CEQA document would provide health-protective benefits to nearby sensitive receptors.

#### *Air Quality Mitigation Measures for NO<sub>x</sub> and PM Emissions from Construction*

Given the Proposed Project's buildout timeline which will extend to 2040, Tier 4 Final engines may no longer represent the cleanest available construction technology when individual phases and later components of the Proposed Project are built. According to CARB's Strategies for Reducing Emissions from Off-Road Construction Equipment, implementation of an off-road Tier 5 standard is anticipated to begin as early as 2027 or 2028. In addition, the Governor's Executive Order in September 2020 requires CARB to develop and propose a full transition to zero emission technology by 2035.<sup>14</sup> As a result, mitigation measures that rely solely on Tier 4 Final engines may be outdated by the time substantial construction occurs, particularly for later phases of the Specific Plan.

Limiting mitigation to a fixed technology level fails to account for foreseeable improvements in equipment availability, contradicts CARB's statewide transition strategy, and does not represent the "maximum feasible" reduction required by CEQA. To ensure construction NO<sub>x</sub> and PM emissions remain less than the CEQA significance thresholds for all future phases and individual projects, the Lead Agency is recommended to strengthen mitigation measures in the Recirculated DEIR's by requiring the use of the cleanest commercially available equipment, including zero-emission or electric construction equipment where feasible, and otherwise the latest certified engine tier available at the time of construction, beyond Tier 4 Final. The mitigation measures should also include provisions that prohibit older diesel engines, require the use of advanced exhaust after-treatment systems, and mandate verification through equipment lists, purchase records, or third-party compliance reporting. These verification requirements are critical to ensuring enforceability as set forth in CEQA Guidelines Section 15126.4 and preventing backsliding to older, higher-emitting equipment once construction begins.

The Recirculated DEIR should also evaluate construction phasing scenarios using updated assumptions about equipment availability, consistent with CARB's regulatory schedule and Executive Order directives. Without such analysis, the Recirculated DEIR may underestimate the feasibility and benefits of zero-emission construction technologies during later stages of the Proposed Project's development.

*Operational Air Quality Mitigation and Sensitive Receptors*

South Coast AQMD staff acknowledges that the Recirculated DEIR identifies operational air quality impacts from the Proposed Project as significant and unavoidable, particularly due to diesel truck activity associated with warehouse and industrial operations. The Recirculated DEIR includes a range of operational mitigation measures (MM AQ-10 through MM AQ-24)<sup>12</sup> which encourage or require actions such as idling restrictions, electric vehicle charging infrastructure, and lease requirements for future zero-emission trucks. While these measures represent a strong foundation for reducing operational emissions, they rely heavily on nonbinding language (“encourage,” “consider,” “where feasible”) and lack the enforceable commitments necessary to reduce emissions to the maximum feasible extent. Sensitive residential receptors are located immediately adjacent to both the Specific Plan area and the Upzone Site. Given the proximity of these homes to the Proposed Project, the Recirculated DEIR should incorporate more robust and enforceable mitigation measures to minimize long-term exposure to DPM, NOx, and associated health risks. Without enforceable requirements, the Proposed Project’s operational emissions could disproportionately affect nearby disadvantaged communities. Specifically, the Lead Agency is recommended to:

1. Require zero-emission (ZE) or near-zero Emission (NZE) trucks rather than merely encouraging ZE/NZE trucks for heavy-duty and medium-duty vehicles, when this equipment becomes commercially available. Measures such as MM AQ-19 and MM AQ-20 could include enforceable compliance mechanisms, such as contractual fleet requirements, annual reporting, tenant lease obligations, and enforcement provisions for noncompliance;
2. Incorporate phased replacement schedules for older more emitting trucks to newer and cleaner equipment which is tied to CARB’s ACF regulatory deadlines to ensure operational emissions decrease as the Proposed Project builds out through 2040;
3. Limit truck exposure to sensitive receptors by incorporating design measures to reduce health risks, including clearly marked truck routes to avoid residential areas, locating truck entrances and exits away from sensitive land uses, placing truck check-in and parking areas inside the Proposed Project’s site, and restricting overnight truck parking near sensitive receptors;
4. Require infrastructure for electric or alternative-fuel trucks, electric yard equipment, and solar energy arrays. Charging infrastructure should be sized to support future ZE truck adoption consistent with ACF requirements, rather than minimum near-term capacity. Yard hostlers, forklifts, and cargo-handling equipment should transition to ZE where commercially available;
5. Limit the daily number of actual trucks visiting the Proposed Project to levels analyzed in the Recirculated DEIR. The mitigation should include an enforceable monitoring mechanism to verify that truck activity remains within analyzed limits; and

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<sup>12</sup> Recirculated DEIR, Table 1-5.

6. Encourage participation in incentive programs, such as the Carl Moyer Program or WAIRE Points under South Coast AQMD Rule 2305, to further reduce NOx and PM emissions.

By strengthening operational mitigation measures, ensuring enforceability, and incorporating design-based protections for adjacent residential communities, the long-term exposure to diesel emissions from the Proposed Project can be substantially reduced while demonstrating consistency with California's clean-fleet transition strategies and the public health protection goals of CEQA.

*Lack of Enforceable Restriction on Transport Refrigeration Units (TRUs) and Risk of Future Tiering*

The Recirculated DEIR states that the building occupants are assumed to be warehouse distributors, logistics operators with some light-duty manufacturing and the buildings are not designed to accommodate any warehouse cold storage or refrigerated uses.<sup>13</sup> However, this statement is not supported by any enforceable commitments, Specific Plan requirements, or conditions of approval. Without binding mechanisms in place, the assertion that transport refrigeration units (TRUs) will not operate on-site is speculative and cannot be relied upon as justification for the assumptions relied upon to estimate emissions and health risk, or operational characteristics under CEQA. Because the Proposed Project proposes large high-cube warehouse and fulfillment buildings, TRU use is a reasonably foreseeable possibility for future tenant operation activities, even if they are not currently contemplated. The absence of TRU infrastructure at the entitlement stage does not prevent future tenants from installing plug-ins or operating diesel TRUs unless expressly prohibited by enforceable conditions. Under CEQA, reasonably foreseeable future operations associated with warehouse uses, particularly those involving DPM, which is a known toxic air contaminant, need to be evaluated.

Additionally, without enforceable project-level restrictions, future approvals could be processed through addenda, minor-use permits, or mitigated negative declarations. Such an approach could allow TRU activity to be introduced incrementally after project approval without conducting the necessary EIR-level analysis of diesel emissions, localized health risks, and carcinogenic impacts. This outcome would conflict with CEQA's prohibition on piecemealing and would not comply with CEQA Guidelines Sections 15162–15168 concerning subsequent review.

To ensure the analysis remains consistent with CEQA and to avoid post-approval introduction of TRUs without adequate environmental review, the Lead Agency is recommended:

- Include an explicit prohibition on TRU use in the Specific Plan text, and conditions of approval;
- Require all future tenant leases, site plans, and tenant improvement approvals to include binding language prohibiting installation or operation of diesel TRUs;
- Identify TRU-related infrastructure (e.g., electric hook-ups, refrigerated trailer parking, dock refrigeration equipment) as prohibited uses under the Specific Plan; and
- Require full CEQA reevaluation, including a health risk assessment, before approving any future tenant or site plan that proposes TRU operations.

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<sup>13</sup> Recirculated DEIR, p. 3-16.

These measures would provide enforceability, ensure transparency in future review, and prevent TRU operations from being added later without adequate CEQA analysis of associated DPM emissions and health risks.

*Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program*

On May 7, 2021, South Coast AQMD's Governing Board adopted Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program, and Rule 316 – Fees for Rule 2305. Rule 2305 and Rule 316 are designed to reduce regional and local emissions of NO<sub>x</sub> and PM, including DPM, with reductions leading to reduced public health impacts for communities located near warehouses from mobile sources that are associated with warehouse activities. Also, these anticipated emission reductions will help the region attain federal and state ambient air quality standards. Rule 2305 applies to owners and operators of warehouses greater than or equal to 100,000 square feet.

The Recirculated DEIR acknowledges the applicability of Rule 2305 to the Proposed Project but does not evaluate whether early infrastructure commitments or WAIRE-compatible design features could serve as feasible mitigation under CEQA. Because many WAIRE actions, such as charging infrastructure installation, solar energy deployment, on-site ZE truck parking, and building electrification, are most efficiently implemented during project construction rather than after occupancy, the analysis in the Recirculated DEIR should identify opportunities for incorporating these features now. Failure to do so could limit operators' ability to comply cost-effectively with Rule 2305 and could reduce achievable NO<sub>x</sub> and PM reductions.

Under Rule 2305, operators are subject to an annual WAIRE Points Compliance Obligation that is calculated based on the annual number of truck trips to the warehouse. WAIRE Points can be earned by implementing actions in a prescribed menu in Rule 2305, implementing a site-specific custom plan, or paying a mitigation fee. Warehouse owners are only required to submit limited information reports, but they can opt to earn Points on behalf of their tenants if they so choose because certain actions to reduce emissions may be better achieved at the warehouse development phase, for instance the installation of solar and charging infrastructure. Rule 316 is a companion fee rule for Rule 2305 to allow South Coast AQMD to recover costs associated with Rule 2305 compliance activities. Since the Proposed Project consists of the development of up to 3,235,836 square feet of industrial and business-park uses, the Proposed Project's warehouse owners and operators may be required to comply with Rule 2305 once the warehouse is occupied.

Therefore, the Lead Agency is recommended to review Rule 2305 to determine the potential WAIRE Points Compliance Obligation for future operators and explore whether additional project requirements and CEQA mitigation measures can be identified and implemented at the Proposed Project in order to help future warehouse operators meet their compliance obligation.<sup>14</sup> South Coast AQMD staff is available to answer questions concerning Rule 2305 implementation and compliance by phone or email at (909) 396-3140 or [waire-program@aqmd.gov](mailto:waire-program@aqmd.gov). For

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<sup>14</sup> South Coast AQMD Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xxiii/r2305.pdf>.



implementation of guidance documents and compliance and reporting tools, please visit South Coast AQMD's WAIRE Program webpage.<sup>15</sup>

*South Coast AQMD Air Permits and Role as a Responsible Agency*

If implementation of the Proposed Project would require the use of new stationary and portable sources, including but not limited to emergency generators, fire water pumps, boilers, etc., one or more air permits from South Coast AQMD will be required. The Final EIR should include a discussion about the South Coast AQMD rules that may be applicable to the Proposed Project. Those rules may include, for example, Rule 201 – Permit to Construct,<sup>16</sup> Rule 203 – Permit to Operate,<sup>17</sup> Rule 401 – Visible Emissions,<sup>18</sup> Rule 402 – Nuisance,<sup>19</sup> Rule 403 – Fugitive Dust,<sup>20</sup> Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,<sup>21</sup> Rule 1113 – Architectural Coatings,<sup>22</sup> Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil,<sup>23</sup> Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants,<sup>24</sup> and Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines,<sup>25</sup> etc.

It is important to note that if air permits from the South Coast AQMD are required, South Coast AQMD's role under CEQA will become the Responsible Agency of the Proposed Project. Per CEQA Guidelines Section 15086, the Lead Agency is required to consult with South Coast AQMD. CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of the process for conducting a review of the Proposed Project and issuing discretionary approvals. Also, as set forth in CEQA Guidelines Section 15096(h), the Responsible Agency is required to make Findings in accordance with CEQA Guidelines Section 15091 for each significant effect of the project and issue a Statement of Overriding Considerations in accordance with CEQA Guidelines Section 15093, if necessary. Lastly, as set forth in CEQA Guidelines Section 15096(i), the Responsible Agency may file a Notice of Determination.

CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of the process for conducting a review of the Proposed Project and issuing discretionary approvals. Moreover, it is important to note that if a Responsible Agency determines that a CEQA document is not adequate to rely upon for its discretionary approvals, the Responsible Agency must take further actions listed in CEQA Guideline Section 15096(e), which could have the effect of delaying the implementation of the Proposed Project. In its role as CEQA Responsible Agency, the South Coast AQMD is obligated to ensure that the CEQA document prepared for this Proposed Project contains

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<sup>15</sup> South Coast AQMD WAIRE Program. Accessed at: <http://www.aqmd.gov/waire>.

<sup>16</sup> South Coast AQMD, Rule 201 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>

<sup>17</sup> South Coast AQMD, Rule 203 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>

<sup>18</sup> South Coast AQMD, Rule 401 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-iv/rule-401.pdf>

<sup>19</sup> South Coast AQMD, Rule 402 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-iv/rule-402.pdf>

<sup>20</sup> South Coast AQMD, Rule 403 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-iv/rule-403>

<sup>21</sup> South Coast AQMD, Rule 1110.2 available at [https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110\\_2.pdf](https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf)

<sup>22</sup> South Coast AQMD, Rule 1113 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf>

<sup>23</sup> South Coast AQMD, Rule 1166 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>

<sup>24</sup> South Coast AQMD, Rule 1466 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf>

<sup>25</sup> South Coast AQMD, Rule 1470 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf>



a sufficient project description and analysis to be relied upon in order to issue any discretionary approvals that may be needed for air permits.

For these reasons, the final CEQA document should be revised to include a discussion about any and all new stationary and portable equipment requiring South Coast AQMD air permits, provide the evaluation of their air quality and greenhouse gas impacts, and identify South Coast AQMD as a Responsible Agency for the Proposed Project as this information will be relied upon as the basis for the permit conditions and emission limits for the air permit(s). Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions regarding what types of equipment would require air permits. For more general information on permits, please visit South Coast AQMD's webpage at <https://www.aqmd.gov/home/permits>.

### Conclusion

As set forth in Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a-b), the Lead Agency shall evaluate comments from public agencies on the environmental issues and provide a written response at least 10 days prior to certifying the Final EIR. As such, please provide South Coast AQMD written responses to all comments contained herein, including the referenced comment letters attached, at least 10 days prior to the certification of the Final EIR. In addition, as provided by CEQA Guidelines Section 15088(c), if the Lead Agency's position is at variance with recommendations provided in this comment letter, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided.

Thank you for the opportunity to provide comments. South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Jivar Afshar, Air Quality Specialist, at [jafshar@aqmd.gov](mailto:jafshar@aqmd.gov) should you have any questions.

Sincerely,

*Sam Wang*

Sam Wang

Program Supervisor, CEQA IGR

Planning, Rule Development & Implementation

### Attachments (3)

- January 2021 NOP Comment Letter
- December 2021 DEIR Comment Letter
- December 2024 NOP of the Recirculated DEIR Comment Letter

MK:BB:ND:BR:SW:JA

SBC251030-07

Control Number

## **ATTACHMENTS**

SENT VIA E-MAIL:

December 12, 2024

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**Notice of Preparation of a Recirculated Draft Environmental Impact Report  
for Bloomington Business Park Specific Plan Project (Proposed Project)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. Our comments are recommendations on the analysis of potential air quality impacts from the Proposed Project that should be included in the Recirculated Draft Environmental Impact Report (EIR). Please send a copy of the Recirculated Draft EIR upon its completion and public release directly to South Coast AQMD as copies of the Recirculated Draft EIR submitted to the State Clearinghouse are not forwarded. **In addition, please send all appendices and technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all emission calculation spreadsheets, and air quality modeling and health risk assessment input and output files (not PDF files). Any delays in providing all supporting documentation for our review will require additional review time beyond the end of the comment period.**

**CEQA Air Quality Analysis**

Staff recommends that the Lead Agency use South Coast AQMD's CEQA Air Quality Handbook and website<sup>1</sup> as guidance when preparing the air quality and greenhouse gas analyses. It is also recommended that the Lead Agency use the CalEEMod<sup>2</sup> land use emissions software, which can estimate pollutant emissions from typical land use development and is the only software model maintained by the California Air Pollution Control Officers Association.

South Coast AQMD has developed both regional and localized significance thresholds. South Coast AQMD staff recommends that the Lead Agency quantify criteria pollutant emissions and compare the emissions to South Coast AQMD's air quality significance thresholds<sup>3</sup> and localized significance thresholds (LSTs)<sup>4</sup> to determine the Proposed Project's air quality impacts. The localized analysis can be conducted by either using the LST screening tables or performing dispersion modeling.

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<sup>1</sup> South Coast AQMD's CEQA Air Quality Handbook and other resources for preparing air quality analyses can be found at: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>.

<sup>2</sup> CalEEMod is available free of charge at: [www.caleemod.com](http://www.caleemod.com).

<sup>3</sup> South Coast AQMD's air quality significance thresholds can be found at: <https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf>

<sup>4</sup> South Coast AQMD's guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips, and hauling trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers and air pollution control devices), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis. Furthermore, emissions from the overlapping construction and operational activities should be combined and compared to South Coast AQMD's air quality significance thresholds for *operation* to determine the level of significance.

If the Proposed Project generates diesel emissions from long-term construction or attracts diesel-fueled vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment.<sup>5</sup>

Also, if implementation of the Proposed Project would require the use of new stationary and portable sources, including but not limited to emergency generators, fire water pumps, boilers, spray booths, etc., one or more air permits from South Coast AQMD will be required, and the role of South Coast AQMD would change from a Commenting Agency to a Responsible Agency under CEQA. The assumptions in the air quality analysis in the EIR will be the basis for evaluating the air permit(s) under CEQA and imposing permit conditions and limits. Questions about air permit requirements should be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385.

In addition, if air permits are required and the South Coast AQMD is identified as a Responsible Agency in the EIR, per CEQA Guidelines Sections 15086, the Lead Agency is required to consult with South Coast AQMD. CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of evaluating the applications for air permits. For these reasons, the EIR should include a discussion about any new stationary and portable equipment requiring South Coast AQMD air permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project, if applicable.

The California Air Resources Board's (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective*<sup>6</sup> is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making

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<sup>5</sup> South Coast AQMD's guidance for performing a mobile source health risk assessment can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.

<sup>6</sup> CARB's *Air Quality and Land Use Handbook: A Community Health Perspective* can be found at: <https://www.aqmd.gov/docs/default-source/ceqa/handbook/california-air-resources-board-air-quality-and-land-use-handbook-a-community-health-perspective.pdf>.

process with additional guidance on strategies to reduce air pollution exposure near high-volume roadways available in CARB's technical advisory<sup>7</sup>.

The South Coast AQMD's *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*<sup>8</sup> includes suggested policies that local governments can use in their General Plans or through local planning to prevent or reduce potential air pollution impacts and protect public health. It is recommended that the Lead Agency review this Guidance Document as a tool when making local planning and land use decisions.

South Coast AQMD staff is concerned about potential public health impacts of siting warehouses within close proximity of sensitive land uses, especially in communities that are already heavily affected by the existing warehouse and truck activities. The South Coast AQMD's Multiple Air Toxics Exposure Study (MATES V), completed in August 2021, concluded that the largest contributor to cancer risk from air pollution is diesel particulate matter (DPM) emissions<sup>9</sup>. According to the MATES V carcinogenic risk interactive map, the area surrounding the Proposed Project has an estimated cancer risk of over 880 in one million<sup>10</sup>. Operation of warehouses generates and attracts heavy-duty diesel-fueled trucks that emit DPM. When the health impacts from the Proposed Project are added to those existing impacts, residents living in the communities surrounding the Proposed Project will possibly face an even greater exposure to air pollution and bear a disproportionate burden of increasing health risks.

### **Mitigation Measures**

In the event that the Proposed Project results in significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize these impacts. Any impacts resulting from mitigation measures must also be analyzed. Several resources to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project include South Coast AQMD's CEQA Air Quality Handbook,<sup>11</sup> South Coast AQMD's Mitigation Monitoring and Reporting Plan for the 2022 Air Quality Management Plan,<sup>12</sup> and Southern California Association of Government's Mitigation Monitoring and Reporting Plan for the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy.<sup>13</sup>

Mitigation measures for operational air quality impacts from mobile sources that the Lead Agency should consider in the Recirculated Draft EIR may include the following:

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<sup>7</sup> CARB's technical advisory can be found at: [https://ww2.arb.ca.gov/sites/default/files/2017-10/rd\\_technical\\_advisory\\_final.pdf](https://ww2.arb.ca.gov/sites/default/files/2017-10/rd_technical_advisory_final.pdf).

<sup>8</sup> South Coast AQMD. 2005. *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*. Available at: <http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf>.

<sup>9</sup> South Coast AQMD. August 2021. *Multiple Air Toxics Exposure Study in the South Coast Air Basin V*. Available at: <http://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-v>.

<sup>10</sup> South Coast AQMD. MATES V Data Visualization Tool. Accessed at: [MATES Data Visualization \(arcgis.com\)](https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook).

<sup>11</sup> <https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>

<sup>12</sup> South Coast AQMD's 2022 Air Quality Management Plan can be found at: <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan> (Chapter 4 - Control Strategy and Implementation).

<sup>13</sup> Southern California Association of Governments' 2020-2045 RTP/SCS can be found at: [https://www.connectsocal.org/Documents/PEIR/certified/Exhibit-A\\_ConnectSoCal\\_PEIR.pdf](https://www.connectsocal.org/Documents/PEIR/certified/Exhibit-A_ConnectSoCal_PEIR.pdf).

- Require zero-emissions (ZE) or near-zero emission (NZE) on-road haul trucks such as heavy-duty trucks with natural gas engines that meet the CARB's adopted optional NOx emissions standard at 0.02 grams per brake horsepower-hour (g/bhp-hr), if and when feasible. Given the state's clean truck rules and regulations aiming to accelerate the utilization and market penetration of ZE and NZE trucks such as the Advanced Clean Trucks Rule<sup>14</sup> and the Heavy-Duty Low NOx Omnibus Regulation<sup>15</sup>, ZE and NZE trucks will become increasingly more available to use. The Lead Agency should require a phase-in schedule to incentivize the use of these cleaner operating trucks to reduce any significant adverse air quality impacts. South Coast AQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency. At a minimum, require the use of 2010 model year<sup>16</sup> that meet CARB's 2010 engine emissions standards at 0.01 g/bhp-hr of particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks. Include environmental analyses to evaluate and identify sufficient electricity and supportive infrastructures in the Energy and Utilities and Service Systems Sections in the CEQA document, where appropriate. Include the requirement in applicable bid documents, purchase orders, and contracts. Operators shall maintain records of all trucks associated with project construction to document that each truck used meets these emission standards, and make the records available for inspection. The Lead Agency should conduct regular inspections to the maximum extent feasible to ensure compliance.
- Limit the daily number of trucks allowed at the Proposed Project to levels analyzed in the Final CEQA document. If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the Proposed Project through CEQA prior to allowing this higher activity level.
- Provide electric vehicle (EV) charging stations or, at a minimum, provide electrical infrastructure and electrical panels should be appropriately sized. Electrical hookups should be provided for truckers to plug in any onboard auxiliary equipment.

Mitigation measures for operational air quality impacts from other area sources that the Lead Agency should consider in the Recirculated Draft EIR may include the following:

- Maximize use of solar energy by installing solar energy arrays.
- Use light colored paving and roofing materials.
- Utilize only Energy Star heating, cooling, and lighting devices, and appliances.
- Use of water-based or low VOC cleaning products that go beyond the requirements of South Coast AQMD Rule 1113.

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<sup>14</sup> CARB. June 25, 2020. *Advanced Clean Trucks Rule*. Accessed at: <https://ww2.arb.ca.gov/our-work/programs/advanced-clean-trucks>.

<sup>15</sup> CARB has recently passed a variety of new regulations that require new, cleaner heavy-duty truck technology to be sold and used in state. For example, on August 27, 2020, CARB approved the Heavy-Duty Low NOx Omnibus Regulation, which will require all trucks to meet the adopted emission standard of 0.05 g/hp-hr starting with engine model year 2024. Accessed at: <https://ww2.arb.ca.gov/rulemaking/2020/hdomnibuslownox>.

<sup>16</sup> CARB adopted the statewide Truck and Bus Regulation in 2010. The Regulation requires diesel trucks and buses that operate in California to be upgraded to reduce emissions. Newer heavier trucks and buses must meet particulate matter filter requirements beginning January 1, 2012. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent. More information on the CARB's Truck and Bus Regulation is available at: <https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm>.

Design considerations for the Proposed Project that the Lead Agency should consider to further reduce air quality and health risk impacts include the following:

- Clearly mark truck routes with trailblazer signs, so that trucks will not travel next to or near sensitive land uses (e.g., residences, schools, day care centers, etc.).
- Design the Proposed Project such that truck entrances and exits are not facing sensitive receptors and trucks will not travel past sensitive land uses to enter or leave the Proposed Project site.
- Design the Proposed Project such that any check-in point for trucks is inside the Proposed Project site to ensure that there are no trucks queuing outside.
- Design the Proposed Project to ensure that truck traffic inside the Proposed Project site is as far away as feasible from sensitive receptors.
- Restrict overnight truck parking in sensitive land uses by providing overnight truck parking inside the Proposed Project site.

On May 7, 2021, South Coast AQMD's Governing Board adopted Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program, and Rule 316 – Fees for Rule 2305. Rules 2305 and 316 are new rules that will reduce regional and local emissions of nitrogen oxides (NOx) and particulate matter (PM), including diesel PM. These emission reductions will reduce public health impacts for communities located near warehouses from mobile sources that are associated with warehouse activities. Also, the emission reductions will help the region attain federal and state ambient air quality standards. Rule 2305 applies to owners and operators of warehouses greater than or equal to 100,000 square feet. Under Rule 2305, operators are subject to an annual WAIRE Points Compliance Obligation that is calculated based on the annual number of truck trips to the warehouse. WAIRE Points can be earned by implementing actions in a prescribed menu in Rule 2305, implementing a site-specific custom plan, or paying a mitigation fee. Warehouse owners are only required to submit limited information reports, but they can opt in to earn Points on behalf of their tenants if they so choose because certain actions to reduce emissions may be better achieved at the warehouse development phase, for instance the installation of solar and charging infrastructure. Rule 316 is a companion fee rule for Rule 2305 to allow South Coast AQMD to recover costs associated with Rule 2305 compliance activities. Since the Proposed Project consists of the development of multi-million-square-foot warehouse, the Proposed Project's warehouse owners and operators will be required to comply with Rule 2305 once the warehouse is occupied. Therefore, South Coast AQMD staff recommends that the Lead Agency review South Coast AQMD Rule 2305 to determine the potential WAIRE Points Compliance Obligation for future operators and explore whether additional project requirements and CEQA mitigation measures can be identified and implemented at the Proposed Project that may help future warehouse operators meet their compliance obligation<sup>17</sup>. South Coast AQMD staff is available to answer questions concerning Rule 2305 implementation and compliance by phone or email at (909) 396-3140 or [waire-program@aqmd.gov](mailto:waire-program@aqmd.gov). For implementation guidance documents and compliance and reporting tools, please visit South Coast AQMD's WAIRE Program webpage<sup>18</sup>.

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<sup>17</sup> South Coast AQMD Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xxiii/r2305.pdf>.

<sup>18</sup> South Coast AQMD WAIRE Program. Accessed at: <http://www.aqmd.gov/waire>.



South Coast AQMD staff is available to work with the Lead Agency to ensure that air quality, greenhouse gas, and health risk impacts from the Proposed Project are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at [swang1@aqmd.gov](mailto:swang1@aqmd.gov).

Sincerely,

*Sam Wang*

Sam Wang

Program Supervisor, CEQA IGR

Planning, Rule Development & Implementation

SW

SBC241113-12

Control Number



# South Coast Air Quality Management District

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

SENT VIA E-MAIL:

December 15, 2021

[Aron.Liang@lus.sbcounty.gov](mailto:Aron.Liang@lus.sbcounty.gov)

Aron Liang, Senior Planner

County of San Bernardino, Land Use Services Department

385 North Arrowhead Avenue, First Floor

San Bernardino, California 92415-0187

**Draft Environmental Impact Environmental Impact Report (EIR) for the Proposed  
Bloomington Business Park Specific Plan Project (Proposed Project)  
(SCH No.: 2020120545)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The County of San Bernardino is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. The following comments on the Draft EIR include recommended revisions to existing air quality project design features, new air quality project design features or mitigation measures, and a discussion of South Coast AQMD permits that the Lead Agency should include in the Final EIR.

Based on the Draft EIR, the Proposed Project consists of construction and operation of 3,235,836 square feet of light industrial, manufacturing, warehousing, and trailer parking uses on a 213-acre site that is located on the southeast corner of Santa Ana Avenue and Alder Avenue in the community of Bloomington. Development will be implemented in two planning areas. Planning Area A has two design options, resulting in either 2,113,640 square feet or 2,712,040 square feet of warehousing uses<sup>1</sup>. Construction of Planning Area A is anticipated to begin in the fourth quarter of 2021 and will be completed by the fourth quarter of 2022<sup>2</sup>. Planning Area B includes future development of industrial business park uses and has a proposed buildout year of 2040<sup>3</sup>.

The Proposed Project consisting of both planning areas as a whole will include 25 project design features (PDFs) for air quality<sup>4</sup>. These features include requirements such as heavy-duty haul trucks used during construction to be equipped with 2010 model year or newer engines, if feasible, and that all facility-owned and operated truck fleets accessing the site during operation are also equipped with 2010 model year or newer engines, among other requirements<sup>5</sup>. Once operational, the Proposed Project is anticipated to generate 8,555 trip-ends per day, 1,290 of which would be made by light-, medium- and heavy-heavy-duty trucks<sup>6</sup>. Although the warehouse tenant is unknown at the time of the release of the Draft EIR, the Proposed Project is not

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<sup>1</sup> Draft EIR. Page 1-3.

<sup>2</sup> *Ibid.* Appendix C1 Air Quality Report.

<sup>3</sup> *Ibid.* Page 3-16.

<sup>4</sup> *Ibid.* Pages 5.3-57 to 59.

<sup>5</sup> *Ibid.* Section 5.3 Air Quality. Pages 5.3-57 to 5.3-59.

<sup>6</sup> *Ibid.* Appendix K1 Traffic Impact Assessment. Pages 67 to 69.

anticipated to include refrigerated logistics uses<sup>7</sup>. Based on the Draft EIR, existing sensitive receptors are 11 feet of the Proposed Project<sup>8</sup>.

Based on a review of the Draft EIR and supporting technical documents, South Coast AQMD staff has three main comments. A summary of these comments is provided as follows with additional details provided in the attachment.

1. Recommended Revisions to Existing Air Quality Project Design Features (PDFs): The Lead Agency requires the use of cleaner on- and off-road construction equipment and operational vehicles, including zero-emission light- and medium-duty trucks, if such trucks are widely available and economically feasible, and installation of electric charging infrastructure (PDF AQ-3, PDF AQ-4, PDF AQ-10, PDF AQ-12, and PDF AQ-13). Additional information on how widely available and economically feasible will be determined should be provided in the Final EIR. Given the close proximity of sensitive receptors, the Lead Agency should strengthen and expand the requirement of using zero-emissions or near-zero emission standards, or at a minimum 2010 model year on-road trucks during operation to all trucks accessing the Proposed Project, and not limit the requirement to those trucks that are owned or contracted by warehouse tenants and/or operators (PDF AQ-9).
2. Additional Recommended Air Quality PDFs or Mitigation Measures: In the Draft EIR, operation of the Proposed Project is found to have significant and unavoidable air quality impacts for VOC and NOx emissions. The Lead Agency should include additional PDFs or mitigation measures to identify clean construction and operational equipment and trucks that are already available and in-use, require their uses by the opening date for Planning Area A in 2022, develop considerations of potential cleaner technologies that will become feasible and available during the lifetime of the Proposed Project (buildout year 2040), develop a process for periodic technology assessment with performance standards, ensure future buildout at the Proposed Project does not exceed what was previously evaluated in the Draft EIR, and clearly mark truck routes with trailblazer signs to ensure truck travel avoids traversing by existing sensitive receptors.
3. Responsible Agency and South Coast AQMD Permits: If the Proposed Project will require the use of stationary equipment such as emergency generator(s) and fire pump(s), permit(s) from South Coast AQMD will be required. The Final EIR should include a discussion of stationary equipment that will require South Coast AQMD permits and identify South Coast AQMD as a CEQA Responsible Agency for the Proposed Project.

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), South Coast AQMD staff requests that the Lead Agency provide South Coast AQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will

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<sup>7</sup> *Ibid.* Chapter 3 Project Description. Page 3-15.

<sup>8</sup> *Ibid.* Section 5.12 Noise. Pages 5.12-15 to 5.12-16.

not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and to the public who are interested in the Proposed Project. Further, if the Lead Agency makes the finding that the recommended revisions to the existing PDFs and the recommended new air quality project design features or mitigation measures are not feasible, the Lead Agency should describe the specific reasons supported by substantial evidence for rejecting them in the Final EIR (CEQA Guidelines Section 15091).

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Alina Mullins, Air Quality Specialist, at [amullins@aqmd.gov](mailto:amullins@aqmd.gov), should you have any questions or wish to discuss the comments.

Sincerely,

*Lijin Sun*

Lijin Sun

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment

LS:AM

SBC210928-09

Control Number

**ATTACHMENT****South Coast AQMD Staff's Summary of Air Quality Analysis and Health Risk Assessment in the Draft EIR**

In the Air Quality Analysis Section of the Draft EIR, the Lead Agency quantified the Proposed Project's maximum daily construction emissions. The Lead Agency considered three different construction options: Opening Year Option 1 and Opening Year Option 2 for Planning Area A, and Future Development/Specific Plan Buildout for Planning Area B. The Lead Agency compared the Proposed Project's construction emissions to South Coast AQMD's recommended regional air quality CEQA significance thresholds. Based on the analysis, the Lead Agency found that, for all three construction options evaluated, the Proposed Project's regional construction air quality impacts would be significant for VOC and NOx emissions<sup>9</sup>. Mitigation Measures (MMs) AQ-1 and AQ-2 would require the use low VOC architectural coatings with no more than 10g/L of VOC and require all off-road construction equipment 50 horsepower or greater to meet Tier 4 emission standards. With implementation of these mitigation measures, both regional VOC and NOx emissions from construction activities from all three construction options would be reduced to less than significance levels<sup>10</sup>.

The Lead Agency also considered three different operational options: Opening Year Option 1, Opening Year Option 2, and Future Development/Specific Plan Buildout. Based on the analysis, the Lead Agency found that all three options would result in significant regional operational air quality impacts from VOC and NOx emissions<sup>11</sup>. MMs AQ-3 through AQ-7 require postage of idling restriction signage, contractual specifications that vendor trucks include energy efficiency improvement features through Carl Moyer, electric vehicle charging stations, installation of infrastructure to support electric forklifts and other interior equipment, and implementation of a transportation management association to coordinate carpooling. However, the Lead Agency found that air quality impacts from operating the Proposed Project under all three options would remain significant and unavoidable for VOC and NOx emissions<sup>12</sup>.

In the Draft EIR, the Lead Agency also quantified the Proposed Project's localized construction and operational emissions and compared them to the applicable South Coast AQMD's localized significance thresholds. Based on the analysis, the Lead Agency found that the Proposed Project's localized construction and operational air quality impacts would be less than significant<sup>13</sup>. Additionally, the Lead Agency calculated cancer risks from Proposed Project's operational activities under Opening Year Option 1, Opening Year Option 2, and Future Development/Specific Plan Buildout and found that the maximum cancer inhalation risk would be of 4.58 in one million, 5.78 in one million, and 3.11 in one million<sup>14</sup>, respectively, all of which would be below South Coast AQMD's CEQA significance threshold of 10 in one million for cancer risk<sup>15</sup>. Finally, the Draft EIR discussed South Coast AQMD Rules 2305 and 316<sup>16</sup>.

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<sup>9</sup> *Ibid.* Section 5.3 Air Quality. Page 5.3-33.

<sup>10</sup> *Ibid.*

<sup>11</sup> *Ibid.* Page 5.3-34

<sup>12</sup> *Ibid.*

<sup>13</sup> Draft EIR. Appendix C1 Air Quality Report. Pages 56 to 62.

<sup>14</sup> *Ibid.* Pages 13 to 35.

<sup>15</sup> South Coast AQMD's CEQA significance threshold of 10 in one million for cancer risk is based on the most current methodology recommended by the California Office of Environmental Health Hazard assessment.

South Coast AQMD staff's detailed comments on the Draft EIR are provided as follows.

**1. Recommended Revisions to Existing Air Quality Project Design Features (PDFs)**

*a) PDF AQ-3, PDF AQ-4, PDF AQ-10, PDF AQ-12, PDF AQ-13*

In the Draft EIR, the Lead Agency incorporated 25 PDFs related to air quality. Several PDFs (PDF AQ-3, PDF AQ-4, PDF AQ-10, PDF AQ-12, and PDF AQ-13) would require implementation of cleaner on- and off-road construction equipment and operational vehicles, including zero-emission light- and medium-duty trucks, and installation of electric charging infrastructure to further support electric vehicle (EV) usage onsite. However, these PDFs will only be implemented by the Lead Agency when they are “widely available and economically feasible” or “whenever feasible”<sup>17</sup>. South Coast AQMD staff recommends that the Lead Agency provide additional information on how “widely available and economically feasible” will be defined and determined in the Final EIR. The recommended information would establish a clear set of standards and criteria for assessing the technological, commercial, and economic availability and feasibility of using both cleaner on- and off-road construction equipment and operational vehicles and installing EV infrastructure, provide public transparency in the Lead Agency's decision-making regarding cleaner on- and off-road construction equipment, operational vehicles, and EV infrastructure, demonstrate a commitment by the Lead Agency to using cleaner on- and off-road construction equipment and operational vehicles and EV infrastructure, ensure implementation when they are available, strengthen the Proposed Project's air quality commitments, and facilitate the purpose and goal of CEQA on public disclosure.

*b) PDF AQ-9*

PDF AQ-9 requires that applicant/developer/tenant require that all facility-owned and operated fleet equipment with a gross vehicle weight rating greater than 14,000 pounds accessing the site meet or exceed 2010 model year emissions standards. Since the Proposed Project's operators, which are unknown at this time, may not have their own fleet equipment, and to further reduce the Proposed Project's significant and unavoidable NOx emissions during operation, South Coast AQMD staff recommends that the Lead Agency strengthen the PDF as follows to require all trucks accessing the Proposed Project are zero-emissions (ZE) or near-zero emissions (NZE) during operation, or at a minimum meet 2010 model year emission standards, not limited to those trucks that are owned or contracted by warehouse tenants and/or operators. This recommendation is needed to protect public health on nearby sensitive receptors that are located within 11 feet of the Proposed Project. It would also support and facilitate implementation of South Coast AQMD Rule 2305 – Warehouse Indirect Source Rule.

**PDF AQ-9:** The Project Applicant/Developer/Tenant shall require that all ~~facility-owned and operated fleet~~ equipment with a gross vehicle weight rating greater than 14,000 pound accessing the site be ZE or NZE operation such as heavy-duty trucks with natural gas engines that meet the CARB's adopted optional NOx emissions standard at 0.02 grams per brake horsepower-hour (g/bhp-hr). At a minimum, this equipment shall meet or exceed 2010

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<sup>16</sup> Draft EIR. Section 5.3 Air Quality. Page 5.3-9.

<sup>17</sup> Draft EIR. Chapter 1 Executive Summary

model-year emissions equivalent engine standards as currently defined in California Code of Regulations Title 13, Division 3, Chapter 1, Article 4.5, Section 2025. Facility operators which own vehicles subject to Section 2025 shall maintain records on-site demonstrating compliance with this requirement and shall make records available for inspection by the local jurisdiction, air district, and state upon request.

## **2. Additional Recommended Air Quality PDFs or Mitigation Measures**

In the Draft EIR, the Lead Agency found that the Proposed Project would result in significant and unavoidable air quality impacts from VOC and NOx emissions during operation. CEQA requires that the Lead Agency consider mitigation measures to minimize significant adverse impacts (CEQA Guidelines Section 15126.4) and that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse impacts. South Coast AQMD staff recommends that the Lead Agency consider including the following operational air quality PDFs or mitigation measures in the Final EIR to further reduce the Proposed Project's significant and unavoidable air quality impacts during operation.

Technology is transforming the goods transport and movement sector at a rapid pace. ZE or NZE construction equipment, cargo handling equipment, and trucks are already commercially available and in-use. Therefore, the Lead Agency should use good-faith efforts to identify the available types of ZE or NZE construction and cargo handling equipment and trucks in the Final EIR and require their uses by the opening date for Planning Area A in 2022.

Clean construction and cargo handling equipment and trucks will become increasingly more feasible and commercially available as technology advances. If using ZE or NZE technologies is not feasible today, it could become feasible in a reasonable period of time during the Proposed Project's buildout schedule by 2040 (CEQA Guidelines Section 15364). Therefore, it is recommended that the Lead Agency include considerations of potential cleaner technologies that will become feasible and available during the lifetime of the Proposed Project and develop a process with performance standards to require and/or accelerate the deployment of the lowest emission technologies and the utilization of ZE or NZE construction and cargo handling equipment and heavy-duty trucks (CEQA Guidelines Section 15126.4(a)). The Lead Agency can and should develop the following performance standards or any other comparable standards in the Final EIR.

- Develop a minimum amount of ZE or NZE construction and cargo handling equipment and heavy-duty trucks that the Proposed Project must use each year during construction and operation to ensure adequate progress. Include this requirement in the Proposed Project's Construction Management Plan, business development agreement(s), and contracts with operator(s).
- Establish a contractor(s), tenant(s), or operator(s) selection policy that prefers contractor(s), tenant(s), or operator(s) who can supply and use ZE or NZE construction and cargo handling equipment and heavy-duty trucks during construction and operation. Include this policy in the Request for Proposal, procurement documents, and purchase order(s) for selecting contractor(s), tenant(s), or operator(s).
- Establish a policy to select and use vendors that use ZE or NZE heavy-duty trucks. Include this policy in the vendor contracts and business agreements.



- Establish a purchasing policy to purchase and receive materials from vendors that use ZE or NZE heavy-duty trucks to deliver materials. Include this policy in the procurement documents and purchase orders with vendors.
- Develop a target-focused and performance-based process and timeline to implement the use of ZE heavy-duty trucks during operation that is consistent with the timeline and requirement for warehouse activities under South Coast AQMD Rule 2305.
- Develop a project-specific process and criteria for periodically assessing progress in implementing the use of ZE heavy-duty trucks during operation.

Additional air quality PDFs or mitigation measures to further reduce the Proposed Project's operational air quality impacts from mobile sources and design considerations that the Lead Agency should consider in the Final EIR may include the followings:

- At this time, the Lead Agency has received development applications for three warehouses and one truck trailer parking lot. The Lead Agency analyzed up to 3,235,836 square feet of development and 8,555 truck trip ends daily. Since the Proposed Project will be fully built out by 2040 and additional developments are unknown at this time, the Lead Agency should limit the daily number of trucks allowed at the Proposed Project to levels that were analyzed in the Final EIR (8,555 daily truck trip ends). If higher daily truck volumes are anticipated to visit the site, especially as the Proposed Project is continued to be built out until 2040, the Lead Agency should commit to re-evaluating the increase in daily truck trips from the Proposed Project through CEQA prior to allowing a higher activity level than previously analyzed.
- In the Draft EIR, the Lead Agency explains that the Proposed Project's truck routes will be limited to south of Laurel Avenue, Locust Avenue, Maple Avenue, Jurupa Avenue, and Cedar Avenue<sup>18</sup>. These routes were used to model the Proposed Project's air quality concentrations during operation<sup>19</sup>. South Coast AQMD staff recommends that the Lead Agency clearly mark truck routes with trailblazer signs to ensure truck travel utilizes the routes analyzed in the Draft EIR and avoids traversing by the existing sensitive receptors (e.g. residents and schools).

### **3. Responsible Agency and South Coast AQMD Permits**

If implementation of the Proposed Project requires the use of stationary equipment, including but is not limited to, emergency generator(s) and emergency fire pump(s), permits from South Coast AQMD are required. The Final EIR should include a discussion on stationary equipment that will require South Coast AQMD permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project. Any assumptions used in the Final EIR will be used as the basis for permit conditions and limits for the Proposed Project. The 2015 revised Office of Environmental Health Hazard Assessment (OEHHA) methodology is being used by South Coast AQMD for determining operational health risks for permitting applications and also for all CEQA projects where South Coast AQMD is the Lead Agency. Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions on permits. For more general information on permits, please visit South Coast AQMD's webpage at: <http://www.aqmd.gov/home/permits>.

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<sup>18</sup> Draft EIR. Section 5.9 Hazards and Hazardous Materials. Page 5.9-32.

<sup>19</sup> Draft EIR. Appendix C2 Health Risk Assessment Report. Pages 17 to 19.

SENT VIA E-MAIL:

January 19, 2021

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**Notice of Preparation of a Draft Environmental Impact Report for  
Bloomington Business Park Specific Plan Project (Proposed Project)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. Our comments are recommendations on the analysis of potential air quality impacts from the Proposed Project that should be included in the Draft Environmental Impact Report (EIR). Please send a copy of the Draft EIR upon its completion and public release directly to South Coast AQMD as copies of the Draft EIR submitted to the State Clearinghouse are not forwarded. **In addition, please send all appendices and technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all emission calculation spreadsheets, and air quality modeling and health risk assessment input and output files (not PDF files). Any delays in providing all supporting documentation for our review will require additional review time beyond the end of the comment period.**

**CEQA Air Quality Analysis**

Staff recommends that the Lead Agency use South Coast AQMD's CEQA Air Quality Handbook and website<sup>1</sup> as guidance when preparing the air quality and greenhouse gas analyses. It is also recommended that the Lead Agency use the CalEEMod<sup>2</sup> land use emissions software, which can estimate pollutant emissions from typical land use development and is the only software model maintained by the California Air Pollution Control Officers Association.

South Coast AQMD has developed both regional and localized significance thresholds. South Coast AQMD staff recommends that the Lead Agency quantify criteria pollutant emissions and compare the emissions to South Coast AQMD's CEQA regional pollutant emissions significance thresholds<sup>3</sup> and localized significance thresholds (LSTs)<sup>4</sup> to determine the Proposed Project's air quality impacts. The localized analysis can be conducted by either using the LST screening tables or performing dispersion modeling.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road

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<sup>1</sup> South Coast AQMD's CEQA Handbook and other resources for preparing air quality analyses can be found at: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>.

<sup>2</sup> CalEEMod is available free of charge at: [www.caleemod.com](http://www.caleemod.com).

<sup>3</sup> South Coast AQMD's CEQA regional pollutant emissions significance thresholds can be found at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>.

<sup>4</sup> South Coast AQMD's guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips, and hauling trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers and air pollution control devices), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis. Furthermore, emissions from the overlapping construction and operational activities should be combined and compared to South Coast AQMD's regional air quality CEQA *operational* thresholds to determine the level of significance.

If the Proposed Project generates diesel emissions from long-term construction or attracts diesel-fueled vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment<sup>5</sup>.

In the event that implementation of the Proposed Project requires a permit from South Coast AQMD, South Coast AQMD should be identified as a Responsible Agency for the Proposed Project in the Draft EIR. The assumptions in the air quality analysis in the Final EIR will be the basis for evaluating the permit under CEQA and imposing permit conditions and limits. Questions on permits should be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385.

The California Air Resources Board's (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective*<sup>6</sup> is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process with additional guidance on strategies to reduce air pollution exposure near high-volume roadways available in CARB's technical advisory<sup>7</sup>.

South Coast AQMD staff is concerned about potential public health impacts of siting warehouses within close proximity of sensitive land uses, especially in communities that are already heavily affected by the existing warehouse and truck activities. The South Coast AQMD's Multiple Air Toxics Exposure Study (MATES IV), completed in May 2015, concluded that the largest contributor to cancer risk from air pollution is diesel particulate matter (DPM) emissions<sup>8</sup>. According to the MATES IV Carcinogenic Risk interactive Map, the area surrounding the Proposed Project has an estimated cancer risk over 880 in one million<sup>9</sup>. Operation of warehouses generates and attracts heavy-duty diesel-fueled trucks that emit DPM. When the health impacts from the Proposed Project are added to those existing impacts, residents living in the communities surrounding the Proposed Project will possibly face an even greater exposure to air pollution and bear a disproportionate burden of increasing health risks.

### **Mitigation Measures**

In the event that the Proposed Project results in significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize these impacts. Any impacts resulting from mitigation measures must also be analyzed. Several resources to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project include South Coast AQMD's CEQA Air Quality Handbook<sup>1</sup>, South Coast AQMD's Mitigation Monitoring and

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<sup>5</sup> South Coast AQMD's guidance for performing a mobile source health risk assessment can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.

<sup>6</sup> CARB's *Air Quality and Land Use Handbook: A Community Health Perspective* can be found at: <http://www.arb.ca.gov/ch/handbook.pdf>.

<sup>7</sup> CARB's technical advisory can be found at: <https://www.arb.ca.gov/ch/landuse.htm>.

<sup>8</sup> South Coast AQMD. May 2015. *Multiple Air Toxics Exposure Study in the South Coast Air Basin*. Available at: <http://www.aqmd.gov/docs/default-source/air-quality/air-toxic-studies/mates-iv/mates-iv-final-draft-report-4-1-15.pdf>.

<sup>9</sup> South Coast AQMD. MATES INV Estimated Risk. Accessed at: <https://scaqmd-online.maps.arcgis.com/apps/webappviewer/index.html?id=470c30bc6daf4ef6a43f0082973ff45f>.

Reporting Plan for the 2016 Air Quality Management Plan<sup>10</sup>, and Southern California Association of Government's Mitigation Monitoring and Reporting Plan for the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy<sup>11</sup>.

Mitigation measures for operational air quality impacts from mobile sources that the Lead Agency should consider in the Draft EIR may include the following:

- Require zero-emissions (ZE) or near-zero emission (NZE) on-road haul trucks such as heavy-duty trucks with natural gas engines that meet the CARB's adopted optional NOx emissions standard at 0.02 grams per brake horsepower-hour (g/bhp-hr), if and when feasible. Given the state's clean truck rules and regulations aiming to accelerate the utilization and market penetration of ZE and NZE trucks such as the Advanced Clean Trucks Rule<sup>12</sup> and the Heavy-Duty Low NOx Omnibus Regulation<sup>13</sup>, ZE and NZE trucks will become increasingly more available to use. The Lead Agency should require a phase-in schedule to incentive the use of these cleaner operating trucks to reduce any significant adverse air quality impacts. South Coast AQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency. At a minimum, require the use of 2010 model year<sup>14</sup> that meet CARB's 2010 engine emissions standards at 0.01 g/bhp-hr of particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks. Include environmental analyses to evaluate and identify sufficient electricity and supportive infrastructures in the Energy and Utilities and Service Systems Sections in the CEQA document, where appropriate. Include the requirement in applicable bid documents, purchase orders, and contracts. Operators shall maintain records of all trucks associated with project construction to document that each truck used meets these emission standards, and make the records available for inspection. The Lead Agency should conduct regular inspections to the maximum extent feasible to ensure compliance.
- Limit the daily number of trucks allowed at the Proposed Project to levels analyzed in the Final CEQA document. If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the Proposed Project through CEQA prior to allowing this higher activity level.
- Provide electric vehicle (EV) charging stations or at a minimum, provide the electrical infrastructure and electrical panels should be appropriately sized. Electrical hookups should be provided for truckers to plug in any onboard auxiliary equipment.

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<sup>10</sup> South Coast AQMD's 2016 Air Quality Management Plan can be found at: <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf> (starting on page 86).

<sup>11</sup> Southern California Association of Governments' 2020-2045 RTP/SCS can be found at: [https://www.connectsocal.org/Documents/PEIR/certified/Exhibit-A\\_ConnectSoCal\\_PEIR.pdf](https://www.connectsocal.org/Documents/PEIR/certified/Exhibit-A_ConnectSoCal_PEIR.pdf).

<sup>12</sup> CARB. June 25, 2020. *Advanced Clean Trucks Rule*. Accessed at: <https://ww2.arb.ca.gov/our-work/programs/advanced-clean-trucks>.

<sup>13</sup> CARB has recently passed a variety of new regulations that require new, cleaner heavy-duty truck technology to be sold and used in state. For example, on August 27, 2020, CARB approved the Heavy-Duty Low NOx Omnibus Regulation, which will require all trucks to meet the adopted emission standard of 0.05 g/hp-hr starting with engine model year 2024. Accessed at: <https://ww2.arb.ca.gov/rulemaking/2020/hdomnibuslownox>.

<sup>14</sup> CARB adopted the statewide Truck and Bus Regulation in 2010. The Regulation requires diesel trucks and buses that operate in California to be upgraded to reduce emissions. Newer heavier trucks and buses must meet particulate matter filter requirements beginning January 1, 2012. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent. More information on the CARB's Truck and Bus Regulation is available at: <https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm>.

Mitigation measures for operational air quality impacts from other area sources that the Lead Agency should consider in the Draft EIR may include the following:

- Maximize use of solar energy by installing solar energy arrays.
- Use light colored paving and roofing materials.
- Utilize only Energy Star heating, cooling, and lighting devices, and appliances.
- Use of water-based or low VOC cleaning products that go beyond the requirements of South Coast AQMD Rule 1113.

Design considerations for the Proposed Project that the Lead Agency should consider to further reduce air quality and health risk impacts include the following:

- Clearly mark truck routes with trailblazer signs, so that trucks will not travel next to or near sensitive land uses (e.g., residences, schools, day care centers, etc.).
- Design the Proposed Project such that truck entrances and exits are not facing sensitive receptors and trucks will not travel past sensitive land uses to enter or leave the Proposed Project site.
- Design the Proposed Project such that any check-in point for trucks is inside the Proposed Project site to ensure that there are no trucks queuing outside.
- Design the Proposed Project to ensure that truck traffic inside the Proposed Project site is as far away as feasible from sensitive receptors.
- Restrict overnight truck parking in sensitive land uses by providing overnight truck parking inside the Proposed Project site.

South Coast AQMD staff is available to work with the Lead Agency to ensure that air quality, greenhouse gas, and health risk impacts from the Proposed Project are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at [lsun@aqmd.gov](mailto:lsun@aqmd.gov).

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

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