

SENT VIA E-MAIL:

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sean.mcpherson@cityofrc.us

Sean McPherson, Principal Planner
City of Rancho Cucamonga, Planning Department
10500 Civic Center Drive
Rancho Cucamonga, CA 91730

**Draft Environmental Impact Report (EIR) for the
Newcastle Arrow Route Project (Proposed Project) (SCH No: 2023110039)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to review the above-mentioned document. The City of Rancho Cucamonga 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 Draft EIR

Based on the Draft EIR, the Proposed Project consists of: 1) demolishing two non-operational and unoccupied industrial buildings that are approximately 157,221 square feet and 20,000 square feet, respectively, and a 100-space surface parking lot; and 2) constructing, operating, and maintaining one concrete tilt-up industrial warehouse building with approximately 334,776 gross square feet of floor area on 14.8 acres.¹ The Proposed Project is located at 12459 Arrow Route in Rancho Cucamonga.² Based on a review of aerial photographs, the nearest sensitive receptor (e.g., residential development) appears to be located 0.3 mile northeast of the project site.³ Construction of the Proposed Project is scheduled to occur over a 12-month period from March 2026 to March 2027.⁴

South Coast AQMD Comments

Potential Underestimation of Health Risk Impacts From On-Site Heavy-Duty Trucks

Based on the Draft EIR, the air quality modeling analysis assumed that all 44 loading docks will be utilized, with each truck idling for 15 minutes at the dock and traveling at five miles per hour (mph) on-site.⁵ The Draft EIR, however, does not provide any evidence or explanation to support these assumptions. While the California Air Resources Board (CARB) limits diesel truck idling to five minutes as set forth in the Airborne Toxic Control Measure (ATCM), an exemption from this requirement is allowed for trucks equipped with engines that meet the optional low-NOx idle emission standard which is typically applicable to model year 2008 and newer trucks. These vehicles, often referred to as “clean idle” certified, are permitted to idle longer than five minutes

¹ Draft EIR, p. 14.

² *Ibid*, p.13.

³ *Ibid*, p. 46.

⁴ *Ibid*, p. 59.

⁵ Draft EIR, p. 94.

when situated more than 100 feet from sensitive land uses such as homes and schools.⁶ Furthermore, CARB's EMFAC2021 Volume III Technical Document (Table 4.4.2-5) indicates that heavy-duty trucks may idle for up to five hours at a single location under certain conditions.⁷ As a practical matter, the idling duration for onsite heavy-duty trucks visiting the Proposed Project site could idle for a much longer duration than what was analyzed in the Draft EIR. Thus, the Health Risk Assessment (HRA) may have substantially underestimated the full extent of operational health risks associated with the diesel particulate matter (DPM) emissions from the anticipated onsite heavy-duty truck activities.

To ensure a more accurate health risk evaluation, the HRA should be updated to reflect truck idling durations that are consistent with regulatory allowances and realistic operational patterns expected for the Proposed Project.

Missing Off-Site Truck Route in AERMOD Modeling Analysis

Accurate representation of the off-site truck routes is essential for accurately modeling and assessing air quality and health risk impacts from diesel truck emissions using AERMOD, as well as for evaluating potential exposure to sensitive receptors. Review of the AERMOD modeling files indicate that the off-site truck route connecting the Proposed Project site to the nearest freeway or major roadway was not clearly identified or included in the modeling input file. The Lead Agency is recommended to revise the AERMOD modeling analysis to clearly depict the entire off-site truck route network, including the segment linking the Proposed Project site to the nearest freeway. For consistency throughout the EIR, the Lead Agency is recommended to update the project description, HRA assumptions, and the traffic study documentation accordingly.

Lack of Commitment to Require Ultra-Low VOC Coatings per Mitigation Measure 3.2-1

Based on the Draft EIR, the estimates of volatile organic compound (VOC) emissions from the use of architectural coatings during construction assume that all coatings used for the Proposed Project will have a VOC content of less than 10 grams per liter (g/L), resulting in total VOC emissions less than the South Coast AQMD air quality significance threshold.⁸ However, this assumption appears to rely on Mitigation Measure 3.2-1: Construction Low VOC Coatings, which requires the use of ultra-low VOC architectural coatings (≤ 10 g/L) during all phases of construction. However, the Draft EIR does not provide sufficient information demonstrating that this mitigation measure is feasible, supported by evidence, or enforceable. Specifically, South Coast AQMD Rule 1113 – Architectural Coatings allows for a wide range of VOC limits depending on the coating type, and products with a VOC content of 10 g/L or less may not be commercially available or technically appropriate for all applications required during construction of the Proposed Project.

To support the conclusion that VOC emissions will be less than the air quality significance threshold after mitigation is applied, the Lead Agency should revise the EIR to ensure the Mitigation Measure 3.2-1 is feasible in practice, not just in modeling assumptions by:

⁶ CARB, Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling was promulgated in [Chapter 13 of the California Code of Regulations, Section 2485: Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling](https://www2.arb.ca.gov/sites/default/files/2022-06/13_CCR_2485_OAL_06222022-2_ADA_06272022_0.pdf), https://www2.arb.ca.gov/sites/default/files/2022-06/13_CCR_2485_OAL_06222022-2_ADA_06272022_0.pdf

⁷ CARB, EMFAC2021 Volume III Technical Document, Table 4.4.2-5, p. 161., https://www2.arb.ca.gov/sites/default/files/2021-03/emfac2021_volume_3_technical_document.pdf

⁸ Draft EIR, p. 102.

- Clearly explaining how Mitigation Measure 3.2-1 will be implemented and enforced; and
- Providing evidence of availability of all intended architectural coatings products with a VOC content of less than 10 g/L, such as Safety Data Sheets, and suitability for the proposed construction activities.

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

Since the Proposed Project consists of the development of a 334,776 square foot warehouse, once the warehouse is occupied, the Proposed Project's warehouse owners and operators will be required to comply with South Coast AQMD Rule 2305 – Warehouse Indirect Source Rule – WAIRE Program and Rule 316 – Fees for Rule 2305. Rule 2305 and Rule 316 aim to reduce regional and local emissions of nitrogen oxides (NOx) and particulate matter (PM), including diesel PM so as to reduce adverse public health impacts on communities located near warehouses. 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 to earn WAIRE 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. 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, design features/enhancements, and CEQA mitigation measures can be identified and implemented at the Proposed Project that may help future warehouse operators meet their compliance obligation. For questions concerning Rule 2305 implementation and compliance, please call (909) 396-3140 or email waire-program@aqmd.gov. For implementation of guidance documents and compliance and reporting tools, please visit South Coast AQMD's WAIRE Program webpage.

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 potentially applicable South Coast AQMD rules that may be applicable to the Proposed Project. Those rules may include, for example, Rule 201 – Permit to Construct,⁹ Rule 203 – Permit to Operate,¹⁰ Rule 401 – Visible Emissions,¹¹ Rule 402 – Nuisance,¹² Rule 403 – Fugitive Dust,¹³ Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,¹⁴ Rule 1113 – Architectural Coatings,¹⁵ Rule 1166 – Volatile Organic Compound Emissions from

⁹ South Coast AQMD, Rule 201 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>

¹⁰ South Coast AQMD, Rule 203 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>

¹¹ South Coast AQMD, Rule 401 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf>

¹² South Coast AQMD, Rule 402 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>

¹³ South Coast AQMD, Rule 403 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403>

¹⁴ South Coast AQMD, Rule 1110.2 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf

¹⁵ South Coast AQMD, Rule 1113 is available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf>

Decontamination of Soil,¹⁶ Rule 1179 – Publicly Owned Treatment Works Operations,¹⁷ Regulation XIII – New Source Review,¹⁸ Rule 1401 – New Source Review of Toxic Air Contaminants,¹⁹ Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants,²⁰ Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines,²¹ etc. It is important to note if air permits from South Coast AQMD are required, the role of South Coast AQMD would change from a Commenting Agency to a Responsible Agency under CEQA. In addition, if South Coast AQMD is identified as a Responsible Agency, 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 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 Guidelines 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 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 EIR should 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 prepare 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 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.

¹⁶ South Coast AQMD, Rule 1166 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>

¹⁷ South Coast AQMD, Rule 1179 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1179.pdf>

¹⁸ South Coast AQMD, Regulation XIII is available at: <https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiii>

¹⁹ South Coast AQMD, Rule 1401 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf>

²⁰ South Coast AQMD, Rule 1466 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf>

²¹ South Coast AQMD, Rule 1470 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf>

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 Sahar Ghadimi, Air Quality Specialist, at sghadimi@aqmd.gov should you have any questions.

Sincerely,
Sam Wang

Sam Wang

Program Supervisor, CEQA IGR
Planning, Rule Development & Implementation

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