



# South Coast Air Quality Management District

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

SENT VIA E-MAIL:

June 25, 2026

[caleb.richards@cityofrc.us](mailto:caleb.richards@cityofrc.us)

Caleb Richards, Senior Planner  
Planning Department  
City of Rancho Cucamonga  
10500 Civic Center Drive  
Rancho Cucamonga, CA 91730

## **Draft Environmental Impact Report (EIR) for the Etiwanda Commerce Center Project (Proposed Project) (SCH No.: 2023110038)**

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 site clearing, grading, and constructing of five warehouse and distribution buildings totaling 1,214,131 square feet of new building floor area on 28 acres of a 63-acre site. Proposed Project components include office space, loading docks, surface parking, internal vehicle circulation, water quality basins, utility infrastructure, and approximately 10 acres of landscaping.<sup>1</sup> Based on a review of aerial photographs, South Coast AQMD staff found that the nearest sensitive receptor (e.g., multi-family residential apartment building) is located approximately 0.4 mile northeast of the project site.<sup>2</sup> Construction of the Proposed Project would occur over approximately 22 months and the project operations are anticipated to commence in 2026.<sup>3</sup> The Proposed Project is located at 8996 Etiwanda Avenue in the City of Rancho Cucamonga.<sup>4</sup>

### **South Coast AQMD Comments**

#### *Enforcement of Mitigation Measures for Operational Cancer Risk*

The Draft EIR estimated that the unmitigated operational cancer risk at the nearest residential receptor, located approximately 0.4 mile from the project site, is 10 in one million, which exceeds South Coast AQMD's CEQA significance threshold and is therefore significant (See **Table 1**). The EIR further concludes that implementation of Mitigation Measures 3.2-2b, 3.2-2c,

---

<sup>1</sup> Draft EIR. Page E-2.

<sup>2</sup> *Ibid.* Page 2-13.

<sup>3</sup> *Ibid.* Page 2-37.

<sup>4</sup> *Ibid.* Page E-2.

and 3.2-2d would reduce the operational cancer risks by 88 percent, resulting in a less-than-significant impact (see **Table 2**).<sup>5</sup>

Risk Type	Residential	Schools	Park
Maximum Incremental Cancer Risk	10	0.4	0.1

**Table 1:** Estimated Unmitigated Operations-Related Health Risk (chances per million).

Risk Type	Residential	Schools	Park
Maximum Incremental Cancer Risk	1	0.01	0.01

**Table 2:** Estimate of Mitigated Operations-Related Health Risk (Chances per Million).

However, the Draft EIR does not explain how these mitigation measures would be enforced, monitored, and verified over the life of the Proposed Project. The conclusion that operational health risks are less than significant relies entirely on the effective implementation and enforcement of these mitigation measures. Therefore, the Final EIR should clearly describe the mechanisms for ensuring compliance with these mitigation measures, including monitoring, reporting, and enforcement procedures, to demonstrate that the projected reduction in cancer risk will be achieved and maintained during project operations.

*Inconsistency Between Construction Hauling Assumptions and California Emissions Estimator Model (CalEEMod) Inputs*

The Project Description in the Draft EIR indicates that the grading and excavation phase would occur over approximately 30 working days and would involve substantial earthmoving activities, including balancing approximately 255,000 cubic yards of cut and fill on-site, with up to 8,700 cubic yards of disturbed daily. The Draft EIR further states that up to 8,000 tons of material would be exported off-site through approximately 450 haul truck trips.<sup>6</sup>

Based on the description, the export of hauling appears to be directly associated with grading and excavation activities. However, a review of the CalEEMod “Construction Trips and Vehicle Mix” outputs shows that zero hauling trips were assigned to the grading phase, while 450 one-way hauling trips per day were assigned to the demolition phase. This inconsistency creates uncertainty regarding the accuracy of the construction emissions analysis. If the material export occurs during grading, as described in the Project Description, the associated haul truck emissions should be reflected in the grading-phase emissions calculations. Assigning these trips to a different construction phase may affect the associated emissions and could influence the identification of peak daily construction emissions used for CEQA significance determination.

Therefore, the Final EIR should clarify: (1) how the total number of haul truck trips were converted into the CalEEMod inputs; (2) why hauling activity was assigned to the demolition

<sup>5</sup> *Ibid.* Page 127.

<sup>6</sup> *Ibid.* Page 2-37.

phase rather than the grading phase; (3) whether the grading-phase emissions analysis fully accounts for the off-site export of up to 8,000 tons of material; and (4) whether the reported construction emissions would change if haul truck activity were modeled during grading consistent with the Project Description. Absent this clarification, it is not possible to determine whether the construction emissions analysis accurately reflects the haul truck activity described for the grading and excavation phase and whether the resulting emissions estimates are supported by substantial evidence.

*Potential Underestimation of Transport Refrigeration Unit (TRU) Idling Duration and Associated Health Risk Impacts*

Based on South Coast AQMD staff's review of the AERMOD modeling files provided in Appendix B - Air Quality Analysis, the assumed on-site Transport Refrigeration Unit (TRU) truck idling duration is 15 minutes per truck during operation. However, according to the California Air Resource Board (CARB)'s Proposed Amendments to the Airborne Toxic Control Measure (ATCM) for In-Use Diesel-Fueled TRUs, a TRU-equipped vehicle enters the facility fully loaded (inbound) and exits the facility fully loaded (outbound), with each loading and unloading process taking 2 hours—totaling 4 hours. Given this, the loading and unloading of goods during a single visit can result in up to 4 hours of idling on-site. By assuming a 15-minute TRU idling duration, the Lead Agency may have underestimated the potential exposure of nearby residents to diesel exhaust emissions, which could pose a significant cancer risk to the community. Therefore, South Coast AQMD staff recommends that the Lead Agency either include a project design feature in the DEIR to limit TRU idling within the Project site to less than 15 minutes or revise the Project's Health Risk Assessment (HRA) to reflect a reasonable TRU idling duration supported by substantial evidence.

*Inconsistencies in Construction Emission Calculations*

Appendix B – Air Quality Impact Analysis indicates that CalEEMod was used to estimate the Proposed Project's regional and localized construction and operational emissions. However, the Estimated Unmitigated Construction Emissions reported in the Draft EIR are inconsistent with CalEEMod output files provided in Appendix B. For example, the CalEEMod output identifies a maximum daily NO<sub>x</sub> emission rate of 51.8 pounds per day during construction, while Draft EIR Table 3.2-11 reports a different value without explanation.

The Final EIR should reconcile these discrepancies, revise the emissions calculations as necessary, and clearly document all the assumptions and adjustments used to derive reported construction emissions and significance determinations.

*Inappropriate Use of South Coast AQMD's Mass Rate Localized Significance Threshold (LST) Look-Up Table and Methodology*

As indicated in Table 3-2 of the South Coast AQMD Localized Significance Threshold (LST) methodology,<sup>7</sup> the LST screening look-up tables are not applicable to projects larger than five acres. Because the Proposed Project site encompasses 63 acres in size and exceeds the applicability criteria for the screening tables, reliance on the LST screening values alone is

---

<sup>7</sup> [Final Localized Significance Threshold Methodology](#)

inconsistent with South Coast AQMD guidance and may not accurately characterize localized air quality impacts. For projects of this scale, a project-specific dispersion modeling analysis or other refined localized air quality analysis should be conducted for both construction and operation, and the results should be included in the Final EIR.

#### *Use of Outdated AERMET and Meteorological Data in AERMOD Modeling*

Appendix B (AQ Report) of the Draft EIR indicates that AERMOD version 24142 and AERMET data version 9 were used. However, South Coast AQMD released a newer, approved version of AERMOD-ready MET data files (Version 11) in October 2024.<sup>8</sup> The updated dataset was developed using the U.S. EPA's AERMET processor Version 22112, along with pre-processors AERMINUTE Version 15272 and AERSURFACE Version 20060.<sup>9</sup> The U.S. EPA's current preferred and recommended meteorological data preprocessor for AERMOD, as of the latest release, is AERMET version 24142, released in November 2024.<sup>10</sup>

The use of outdated meteorological data for the analysis contained in the Draft EIR is inconsistent with the U.S. EPA's Guideline on Air Quality Models (40 CFR Part 51, Appendix W)<sup>11</sup> and may have resulted in inaccurate or underestimated health risk estimates. To ensure accuracy and consistency with federal modeling guidelines, the Lead Agency is recommended to re-run the air dispersion modeling using the more recent meteorological data processed by the most recent U.S. EPA-recommended versions of AERMET.

#### *Cumulative Air Quality Impacts*

South Coast AQMD staff identified other existing warehouse uses within approximately one mile of the project site. CEQA requires evaluation of cumulative impacts, including increased air quality concentrations (criteria pollutants and air toxics) from past, present, and reasonably foreseeable future projects. For the air toxics cumulative impacts, at a minimum, the Final EIR should include a qualitative cumulative analysis, with consideration given to a quantitative evaluation where feasible.

#### *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. 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

---

<sup>8</sup> South Coast AQMD AERMOD-Ready MET Data Files available

at [https://www.aqmd.gov/assets/aermet/AERMET\\_files\\_And\\_HRA\\_Tool.html](https://www.aqmd.gov/assets/aermet/AERMET_files_And_HRA_Tool.html)

<sup>9</sup> South Coast AQMD Data for AERMOD available at <https://www.aqmd.gov/home/air-quality/meteorological-data/data-foraermod>

<sup>10</sup> U.S. EPA Air Quality Dispersion Modeling - Preferred and Recommended Models available

at <https://www.epa.gov/scram/meteorological-processors-and-accessory-programs>

<sup>11</sup> Code of Federal Regulations. Title 40. Part 51. Appendix W available at <https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-51/appendix-Appendix%20W%20to%20Part%2051>

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 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 a 1,214,131 square feet 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>12</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>13</sup>

#### *Overlapping Construction and Operational Activities*

Even though the Proposed Project consists of approximately a total of 63 acres of land over the course of 22 months construction, the Draft EIR does not analyze the scenario of overlapping between the construction and operational activities. Therefore, South Coast AQMD staff recommends that the Lead Agency revise the air quality analysis section to consider the overlapping construction and operation. The estimated overlapped emissions should then be compared to South Coast AQMD's regional air quality CEQA operational thresholds to determine their level of significance, which should be included in the Final EIR. If the overlapped emissions analysis is not included in the Final EIR, the Lead Agency should provide reasons for not having them supported by substantial evidence in the record.

#### *Additional Recommended Air Quality and Greenhouse Gases Mitigation Measures and Project Design Considerations*

CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse air quality impacts. To further reduce the Proposed Project's air quality impacts, South Coast AQMD recommends incorporating the following mitigation measures and project design considerations into the Final EIR.

#### *Mitigation Measures for Operational Air Quality Impacts*

---

<sup>12</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>13</sup> South Coast AQMD WAIRE Program. Accessed at: <http://www.aqmd.gov/waire>.

### Mobile Sources

1. Require zero-emission (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.

Note: 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 and the Heavy-duty Low NOx Omnibus Regulation, ZE and NZE trucks will become increasingly more available to use.

2. Require a phase-in schedule to incentivize the use of cleaner operating trucks to reduce any significant adverse air quality impacts.

Note: South Coast AQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency.

3. Limit the daily number of trucks allowed at the Proposed Project to levels analyzed in the Final EIR. If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the Proposed Project through CEQA prior to allowing this higher activity level.
4. 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.

### Other Area Sources

1. Maximize the use of solar energy by installing solar energy arrays.
2. Use light-colored paving and roofing materials.
3. Utilize only Energy Star heating, cooling, and lighting devices and appliances.

### Design Considerations for Reducing Air Quality and Health Risk Impacts

1. Clearly mark truck routes with trailblazer signs so that trucks will not travel next to or near sensitive land uses (e.g., residences, schools, daycare centers, etc.).
2. 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.
3. Design the Proposed Project such that any truck check-in point is inside the Proposed Project site to ensure no trucks are queuing outside.

4. Design the Proposed Project to ensure that truck traffic inside the Proposed Project site is as far away as feasible from sensitive receptors.
5. Restrict overnight truck parking in sensitive land uses by providing overnight truck parking inside the Proposed Project site.

Lastly, the South Coast AQMD also suggests that the Lead Agency conduct a review of the following references and incorporating additional mitigation measures as applicable to the Proposed Project in the Final EIR:

1. State of California – Department of Justice: Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act<sup>14</sup>
2. South Coast AQMD 2022 Air Quality Management Plan,<sup>15</sup> specifically:
  - a) Appendix IV-A – South Coast AQMD’s Stationary and Mobile Source Control Measures
  - b) Appendix IV-B – CARB’s Strategy for South Coast
  - c) Appendix IV-C – SCAG’s Regional Transportation Strategy and Control Measure
3. United States Environmental Protection Agency (U.S. EPA): Mobile Source Pollution - Environmental Justice and Transportation.<sup>16</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., air permits from South Coast AQMD will be required. The final CEQA document, should include a discussion about the potentially applicable rules that the Proposed Project needs to comply with. Those rules may include, for example, Rule 201 – Permit to Construct,<sup>17</sup> Rule 203 – Permit to Operate,<sup>18</sup> Rule 401 – Visible Emissions,<sup>19</sup> Rule 402 – Nuisance,<sup>20</sup> Rule 403 – Fugitive Dust,<sup>21</sup> Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,<sup>22</sup> Rule 1113 – Architectural Coating,<sup>23</sup> Regulation XIII – New Source Review,<sup>24</sup> Rule 1401 – New Source Review of Toxic

---

<sup>14</sup> State of California – Department of Justice, Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act. Available at: <https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf>

<sup>15</sup> South Coast AQMD, 2022 Air Quality Management Plan (AQMP). Available at: <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan>

<sup>16</sup> United States Environmental Protection Agency (U.S. EPA), Mobile Source Pollution - Environmental Justice and Transportation. Available at: <https://www.epa.gov/mobile-source-pollution>.

<sup>17</sup> South Coast AQMD. Rule 201 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>

<sup>18</sup> South Coast AQMD. Rule 203 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>

<sup>19</sup> South Coast AQMD. Rule 401 available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf>

<sup>20</sup> South Coast AQMD. Rule 402 available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>

<sup>21</sup> South Coast AQMD. Rule 403 available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403>

<sup>22</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>23</sup> South Coast AQMD. Rule 1113 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf>

Air Contaminants,<sup>25</sup> Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines,<sup>26</sup> etc. It is important to note that when 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 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 a sufficient project description and analysis to be relied upon in order to issue any discretionary approvals that may be needed for air permits. South Coast AQMD is concerned that the project description and analysis in its current form in the Draft EIR is inadequate to be relied upon for this purpose.

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 California 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.

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

---

<sup>24</sup> South Coast AQMD. Regulation XIII available at: <https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiii>

<sup>25</sup> South Coast AQMD. Rule 1401 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf>

<sup>26</sup> South Coast AQMD. Rule 1470 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf>

comment letter. Please contact Sahar Ghadimi, Air Quality Specialist, at [sghadimi@aqmd.gov](mailto:sghadimi@aqmd.gov) should you have any questions.

Sincerely,

*Sam Wang*

Sam Wang

Program Supervisor, CEQA IGR

Planning, Rule Development & Implementation

SW:SG

SBC260512-03

Control Number