



South Coast Air Quality Management District

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Draft Environmental Impact Report (EIR) for the Public Works Corporate Yard Project (Proposed Project) (SCH No: 2025090223)

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to review the above-mentioned document. The City of Ontario 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 developing a new Public Works Corporate Yard at 2200 East Philadelphia Street in Ontario to replace the existing facility located at South Bon View Avenue.¹ The Proposed Project would include 10 buildings and 13 non-building structures as follows: 28,086 square feet (sf) central office, 10,932 sf Supervisory Control and Data Acquisition (SCADA), 39,068 sf shops/office, 68,587 sf central warehouse, 56,583 sf fleet maintenance, 12,810 sf IW shops/dirty classroom, 3,565 sf SB hazardous waste disposal, 45,001 sf transfer station, 4 levels of parking structure, 6,804 sf washbay, and other amenities.² A western portion of the site is not currently planned and is assumed for future development of 50,000 sf general warehouse, 28,000 sf office uses, and appurtenant infrastructure and amenities.³ The Proposed Project site is currently developed with open space recreational uses.⁴ Based on the review of aerial images, the nearest sensitive receptors (e.g., residents) are approximately 830 feet south-southwest of the Proposed Project boundary. Construction is estimated to occur over three years and four months.⁵

¹ Draft EIR. p. 3-6.

² *Ibid.* p. 3-7 and 3-8.

³ *Ibid.* p. 3-14.

⁴ *Ibid.* p. 3-2.

⁵ *Ibid.* p. 4.2-18.

South Coast AQMD Comments

Truck Idling Duration and Emissions Modeling

Section 4.2 (Air Quality) of the Draft EIR states that the Proposed Project would generate 790 truck trips per day⁶ and according to the provided technical files by the Lead Agency, labeled as *Ontario PW HRA Calcs Update*, the evaluation of truck emissions as diesel particulate matter (DPM) assumes that each truck will idle 15 minutes per day.⁷ However, the actual idling times may be much longer because the Proposed Project is anticipated to involve a total of 790 daily truck trips. Moreover, it is reasonable to expect that individual trucks may experience extended periods of idling due to on-site queuing, security checks, staging, loading, and unloading operations, among other factors, particularly during peak hours or in congested circulation areas. As such, a 15-minute idling duration may underestimate the actual on-site idling behavior and, consequently, the resulting DPM emissions, which are a key contributor to localized health risks.

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 when situated more than 100 feet from sensitive land uses such as homes and schools.⁸ 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.⁹ For these aforementioned reasons, 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 HRA may have substantially underestimated the full extent of operational health risks associated with the DPM emissions from the anticipated onsite heavy-duty truck activities.

Accurate characterization of idling activity is essential to fully assess the potential health risk impacts, particularly for nearby sensitive receptors. Therefore, to ensure the HRA provides an accurate and health-protective estimate of potential exposure, the Lead Agency is recommended to either: 1) revise the operational emissions modeling in the Final EIR to assume a minimum of 30 minutes of idling per truck per day, unless site-specific data or operational constraints justify a different duration; or 2) provide empirical evidence, such as facility-specific queuing and processing time studies, vehicle circulation modeling, or comparable industry data, to support the 15-minute idling assumption as representative of expected operations of the Proposed Project.

⁶ *Ibid.* p. 4.2-19.

⁷ Provided technical file labeled as *Ontario PW HRA Calcs Update*.

⁸ 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, available at https://ww2.arb.ca.gov/sites/default/files/2022-06/13_CCR_2485_OAL_06222022-2_ADA_06272022_0.pdf

⁹ CARB, EMFAC2021 Volume III Technical Document, Table 4.4.2-5, p. 161., available at https://ww2.arb.ca.gov/sites/default/files/2021-03/emfac2021_volume_3_technical_document.pdf

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.

Mobile Sources

1. Require: a) zero-emissions (ZE) or near-zero emission (NZE) on-road haul trucks such as heavy-duty trucks with natural gas engines that meet CARB's adopted optional NOx emissions standard at 0.02 grams per brake horsepower-hour (g/bhp-hr), if and when feasible; and b) a phase-in schedule to incentivize the use of these cleaner operating trucks.

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 Rule¹⁰ and the Heavy-Duty Low NOx Omnibus Regulation¹¹, ZE and NZE trucks will become increasingly more available to use. South Coast AQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency.

2. Require the use of 2017 model year¹² or newer, cleaner trucks, if ZE or NZE trucks are not feasible. All heavy-duty haul trucks should also meet CARB's lowest optional low-NOx standard.¹³ Include environmental analyses to evaluate and identify sufficient electricity and supportive infrastructure 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.
3. Require that all applicable Medium-Heavy Duty Truck (MHDT), Heavy-Heavy Duty Truck (HHDT), and other on-road diesel-fueled heavy-duty vehicles subject to CARB Clean Idle requirements be equipped with engines that are certified by CARB to the

¹⁰ CARB, June 25, 2020, Advanced Clean Trucks Rule, available at: <https://ww2.arb.ca.gov/our-work/programs/advanced-clean-trucks>.

¹¹ 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 grams per brake horsepower-hour (g/bhp-hr) starting with engine model year 2024. Available at: <https://ww2.arb.ca.gov/rulemaking/2020/hdomnibuslownox>.

¹² CARB adopted the statewide Truck and Bus Regulation in 2010 which requires diesel trucks and buses that operate in California to be upgraded to reduce emissions. Specifically, newer heavier trucks and buses must meet particulate matter filter requirements beginning January 1, 2012 and 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>.

¹³ In 2013, CARB adopted optional low-NOx emission standards for on-road heavy-duty engines. CARB encourages engine manufacturers to introduce new technologies to reduce NOx emissions below the current mandatory on-road heavy-duty diesel engine emission standards for model-year 2010 and later. CARB's optional low-NOx emission standard is available at: <https://ww2.arb.ca.gov/our-work/programs/optionalreduced-nox-standards>

applicable Clean Idle standard and, where applicable, display the CARB-approved “Certified Clean Idle” label.¹⁴

4. Limit the daily number of trucks allowed at the Proposed Project to the 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.
5. Provide electric vehicle (EV) charging stations or, at a minimum, provide electrical infrastructure and appropriately sized electrical panels to support EV charging. 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 incorporate 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 Act¹⁵

¹⁴ CARB Idling Flyer available at: https://ww2.arb.ca.gov/sites/default/files/2022-06/Idling_Flyer_EN.pdf

¹⁵ 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>

2. South Coast AQMD 2022 Air Quality Management Plan,¹⁶ 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 Measures

3. United States Environmental Protection Agency (U.S. EPA): Mobile Source Pollution - Environmental Justice and Transportation.¹⁷

South Coast AQMD Air Permits, Role as a Responsible Agency

Section 4.2 (Air Quality) of the Draft EIR assumes that the Proposed Project would include the installation of diesel-powered emergency generators, one 903 and one 237 horsepower.¹⁸ In addition, paint booth is also included as part of the Proposed Project. Therefore, 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,¹⁹ Rule 203 – Permit to Operate,²⁰ Rule 401 – Visible Emissions,²¹ Rule 402 – Nuisance,²² Rule 403 – Fugitive Dust,²³ Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,²⁴ Rule 1113 – Architectural Coatings,²⁵ Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil, Regulation XIII – New Source Review,²⁶ Rule 1401 – New Source Review of Toxic Air Contaminants,²⁷ Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants, Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines,²⁸ and etc. Since air permits from South Coast AQMD will be required for the Proposed Project, the role of South Coast AQMD has changed from a Commenting Agency to a Responsible Agency under CEQA. In addition, the Lead Agency is required to consult with South Coast AQMD as a Responsible Agency per CEQA Guidelines Section 15086.

Thus, as set forth in CEQA Guidelines Section 15096, South Coast AQMD should be identified in the CEQA document as a Responsible Agency for the Proposed Project. Given the certainty that discretionary air permits will be required, early consultation is necessary to ensure that the CEQA

¹⁶ 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>

¹⁷ United States Environmental Protection Agency (U.S. EPA), Mobile Source Pollution - Environmental Justice and Transportation. Available at: <https://www.epa.gov/mobile-source-pollution>.

¹⁸ Draft EIR, p. 4.2-19.

¹⁹ South Coast AQMD, Rule 201 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>

²⁰ South Coast AQMD, Rule 203 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>

²¹ South Coast AQMD, Rule 401 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf>

²² South Coast AQMD, Rule 402 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>

²³ South Coast AQMD, Rule 403 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403>

²⁴ South Coast AQMD, Rule 1110.2 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf

²⁵ South Coast AQMD, Rule 1113 is available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf>

²⁶ South Coast AQMD, Regulation XIII is available at: <https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiii>

²⁷ South Coast AQMD, Rule 1401 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf>

²⁸ South Coast AQMD, Rule 1470 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf>

document is sufficient for South Coast AQMD's use as a Responsible Agency and to avoid future procedural or legal barriers to permit issuance.

Conclusion

As set forth in Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a) and (b), the Lead Agency shall evaluate comments from public agencies on 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 are available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Danica Nguyen, Air Quality Specialist, at dnguyen1@aqmd.gov or me at swang1@aqmd.gov should you have any questions.

Sincerely,

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