



South Coast Air Quality Management District

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E-MAILED: May 12, 2010

May 12, 2010

Ms. Gina Gibson
City of Rialto
Development Services Department
150 South Palm Avenue
Rialto, CA 92376

Review of the Final Environmental Impact Report (Final EIR) for the Proposed Rialto Commerce Center Development Project

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the lead agency and should be incorporated into the Final Environmental Impact Report (Final EIR) as appropriate.

On December 4, 2009 the AQMD staff provided the lead agency with comments on the Re-Circulated Draft EIR for the proposed project (attached). Specifically, AQMD staff requested that the lead agency incorporate the following into the Final EIR: a revised health risk assessment (HRA) that accounts for potential rail service emissions, a revised cumulative air quality impacts analysis quantifying impacts from the foreseen planned industrial site adjacent to the subject property, and additional mitigation measures to minimize air quality impacts from project operations. In response, the lead agency revised the HRA to include potential rail service emissions and determined that the potential health risk would be 7.2 in one million, less than AQMD's significance threshold of ten in one million. However, it appears that the Final EIR did not address AQMD staff's comments specific to cumulative air quality impacts and operational mitigation measures. Therefore, AQMD staff would like to remind the lead agency that a written response to comments provided by the AQMD is required pursuant to Public Resources Code Section 21092.5.

AQMD staff is concerned about the significant air quality impacts from diesel truck emissions during the project's operational activities, specifically that the assumed trip rate does not match the proposed project. Based on past CEQA documents reviewed by AQMD staff, warehouse projects typically contain about 115 loading docks per one million square feet, thus, a warehouse project similar to the Rialto Commerce Center (3.6 million square feet) could yield over 400 loading docks. As a result, a daily trip value of

391 four axle (heavy duty) trucks may provide an underestimate of air quality impacts from the proposed project. The significance determination for this project is based on only 391 heavy duty trips per day or 195 trucks visiting the project site on a daily basis. Therefore, AQMD staff requests that the lead agency further demonstrate that the maximum daily heavy duty truck trips for the project will not exceed 391 trips per day or provide enforceable conditions to ensure that the project does not create additional significant operational air quality impacts prior to certification of the Final EIR.

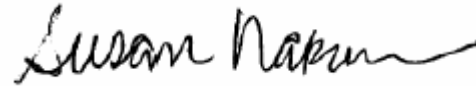
Also, given the project's potential exposure of sensitive receptors surrounding the project site to diesel emissions, AQMD staff strongly recommends adding the following mitigation measures to minimize potentially significant air quality impacts from the operational phase of the project, if feasible:

NO_x:

- ❖ Restrict operation to “clean” trucks, such as a 2007 or newer model year or 2010 compliant vehicle;
- ❖ Avoid siting new sensitive land uses within 1,000 feet of the warehouse/distribution center;
- ❖ Design the warehouse/distribution center such that entrances and exits discourage trucks from traversing past neighbors or other sensitive receptors;
- ❖ Develop, adopt and enforce truck routes both in an out of city and in and out of facilities;
- ❖ Have truck routes clearly marked with trailblazer signs, so trucks will not enter residential areas;
- ❖ Identify or develop secure locations outside of residential neighborhoods where truckers that live in the community can park their truck, such as a Park & Ride;
- ❖ Re-route truck traffic by adding direct off-ramps for the truck or by restricting truck traffic on certain sensitive routes;
- ❖ Require or provide incentives for particulate traps that meet CARB certified level 3 requirements;
- ❖ Electrify service equipment at facility;
- ❖ Improve traffic flow by signal synchronization; and
- ❖ Conduct air quality monitoring at sensitive receptors.

AQMD staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Ian MacMillan, Program Supervisor CEQA Section, at (909) 396-3244, if you have any questions regarding the enclosed comments.

Sincerely,

A handwritten signature in black ink that reads "Susan Nakamura". The signature is fluid and cursive, with a long horizontal flourish at the end.

Susan Nakamura
Planning Manager

Attachment

IM:DG

SBC100330-09
Control Number