



# South Coast Air Quality Management District

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## **Draft Mitigated Negative Declaration (Draft MND) for the Proposed Phelan Center Cucamonga Project (Tentative Parcel Map SUBTPM18794)**

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 Mitigated Negative Declaration.

In the project description, the lead agency proposes to subdivide three parcels with a combined area of 904,000 square feet (approximately 20.7 acres) into a twelve parcels with a total of twelve buildings to develop an industrial/warehouse complex. Although the lead agency estimated that the proposed project would generate approximately 2,625 daily trips, there is no indication of whether or not the increased number of vehicle trips will include trips by heavy-duty diesel trucks transporting materials to and from the proposed industrial development. This information is important for two reasons. First, vehicle trip emissions contribute to air quality impacts from the proposed project. Second, the California Air Resources Board has classified the particulate portion of diesel exhaust emissions as carcinogenic. If there is a substantial increase in the number of heavy-duty diesel truck trips, an air toxics health risk analysis may be warranted. The AQMD has developed a methodology for estimating cancer risks from mobile sources in a document entitled Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions. This document can be downloaded from the AQMD's CEQA web page.<sup>1</sup>

The AQMD also recommends that the lead agency consider the following recommended guidelines from the Western Riverside Council of Governments (WRCOG) that pertain to new or modified warehouse land uses. A copy of the "Good Neighbor Guidelines for Siting New and/or Modified Warehouse/Distribution Facilities" is available directly from WRCOG. The Guidelines were developed through the WRCOG's Regional Air Quality Task Force. The objective of the Guidelines is to provide local governments and developers with a menu of options of strategies that can reduce exposure to diesel particulate from new and/or modified warehouse or distribution centers. The Guidelines include 7 goals, and a variety of strategies for each goal that can be implemented in whole or part. There are a variety of benefits associated with adopting the guidelines,

such as reducing the exposure of residents and sensitive receptors to diesel emissions. The Guidelines can be downloaded from the WRCOG web page. This WRCOG link can be accessed from the SCAQMD webpage at the following URL: <http://www.aqmd.gov/>. Please scroll down on the left hand side to CEQA and then to the Air Quality Analysis Handbook dropdown. The Guidelines link is further down on the Handbook page. Any questions pertaining to the Guidelines can be directed to WRCOG at (951) 955-7985.

In addition to evaluating the above-mentioned air quality impacts, the AQMD recommends that the lead agency estimate localized air quality impacts to ensure that any nearby sensitive receptors are not adversely affected by the construction activities that are occurring in close proximity. It is noted on page four under surrounding land uses and in an aerial map inspection that the proposed project is located within one-quarter mile of sensitive receptors (residential property) southeast and west of the proposed project. AQMD guidance for performing a localized air quality analysis can be found on the AQMD web page.<sup>2</sup> Should the lead agency conclude after its analyses that construction or operational localized air quality impacts exceed the AQMD daily significance thresholds, staff has compiled mitigation measures in addition to those measures listed on pages 5-7 of the Draft MND that can be implemented if the air quality impacts are determined to be significant.<sup>3</sup>

Please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. The SCAQMD staff would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,



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<sup>1</sup> <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>

<sup>2</sup> [http://www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html)

<sup>3</sup> [http://www.aqmd.gov/ceqa/handbook/mobile\\_toxic/diesel\\_analysis.doc](http://www.aqmd.gov/ceqa/handbook/mobile_toxic/diesel_analysis.doc)