



South Coast
Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

E-Mailed: December 7, 2011
scasey@fontana.org

December 7, 2011

Shannon J. Casey
Senior Planner
8353 Sierra Avenue
Fontana, CA 92335

**Review of the Draft Environmental Impact Report (Draft EIR)
for the Proposed Southwest Industrial Park Specific Plan Update 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.

The AQMD staff is concerned about the potential cumulative health risk impacts to sensitive land uses (i.e., residential units, schools, and day care centers) from new industrial land uses identified in the proposed project. Therefore, the lead agency should revise the Draft EIR to address the project's potential cumulative health risk impacts. Further, the AQMD staff recommends that additional mitigation measures be considered to minimize the project's significant air quality impacts pursuant to Section 15126.4 of the California Environmental Quality Act (CEQA) Guidelines. Details regarding these comments are attached to this letter.

Pursuant to Public Resources Code Section 21092.5, AQMD staff requests that the lead agency provide the AQMD with written responses to all comments contained herein prior to the adoption of the final EIR. Further, staff is available to work with the lead agency

to address these issues and any other questions that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,

A handwritten signature in black ink that reads "Ian V. MacMillan". The signature is written in a cursive style with a large initial "I".

Ian MacMillan

Program Supervisor, CEQA Inter-Governmental Review
Planning, Rule Development & Area Sources

Attachment

IM:DG

SBC111020-01
Control Number

Potential Cumulative Health Risk Impacts to Sensitive Land Uses

1. The AQMD staff is concerned about the potential cumulative health risk impacts to sensitive land uses from industrial sources in the proposed project. Specifically, the AQMD staff is concerned about the proposed land use plan (Exhibit 2-3) that depicts a variety of new industrial uses placed adjacent to sensitive land uses (i.e., residential units, schools and daycare centers) between Interstate 10 and Jurupa Avenue. The lead agency provides discussion on the potential impacts to sensitive land uses from industrial emissions sources and mitigation on pages 4.2-28 through 4.2-32 of the Draft EIR, but does not adequately address the potential cumulative impacts from future industrial emissions sources.

Based on the lead agency's discussion for cumulative impacts on page 4.2-56 of the Draft EIR the project will have significant cumulative impacts from criteria pollutants during operation. However, this determination does not account for cumulative health risk impacts from toxic air pollutants emitted by the potentially significant volume of industrial uses identified in the proposed project. As a result, the AQMD staff is concerned about the potential cumulative health risk impacts from facility and area-wide emissions that will likely result from the proposed new industrial uses. Therefore, the lead agency should revise the Draft EIR to further analyze and address the project's potential cumulative health risk impacts and, if applicable, include additional mitigation measures to reduce significant impacts to the extent feasible.

Mitigation Measures for Construction Air Quality Impacts

2. Given that the lead agency concluded that the proposed project will have significant construction related air quality impacts, the AQMD staff recommends that the lead agency provide additional mitigation pursuant to CEQA Guidelines §15126.4. Specifically, AQMD staff recommends that the lead agency minimize or eliminate significant adverse air quality impacts by adding the mitigation measures provided below.
 - Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow,
 - Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site,
 - Reroute construction trucks away from congested streets or sensitive receptor areas,
 - Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation,
 - Improve traffic flow by signal synchronization, and ensure that all vehicles and equipment will be properly tuned and maintained according to manufacturers' specifications,
 - Use coatings and solvents with a VOC content lower than that required under AQMD Rule 1113,

- Construct or build with materials that do not require painting,
- Require the use of pre-painted construction materials,
- Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export). If the lead agency determines that 2010 model year or newer diesel trucks cannot be obtained the lead agency shall use trucks that meet EPA 2007 model year NOx and PM emissions requirements,
- During project construction, all internal combustion engines/construction equipment operating on the project site shall meet EPA-Certified Tier 2 emissions standards, or higher according to the following:
 - ✓ Project Start, to December 31, 2011: All offroad diesel-powered construction equipment greater than 50 hp shall meet Tier 2 offroad emissions standards. In addition, all construction equipment shall be outfitted with the BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 2 or Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
 - ✓ January 1, 2012, to December 31, 2014: All offroad diesel-powered construction equipment greater than 50 hp shall meet Tier 3 offroad emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
 - ✓ Post-January 1, 2015: All offroad diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
 - ✓ A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.
 - ✓ Encourage construction contractors to apply for AQMD "SOON" funds. Incentives could be provided for those construction contractors who apply for AQMD "SOON" funds. The "SOON" program provides funds to accelerate clean up of off-road diesel vehicles, such as heavy duty construction equipment. More information on this program can be found at the following website: <http://www.aqmd.gov/tao/Implementation/SOONProgram.htm>

For additional measures to reduce off-road construction equipment, refer to the mitigation measure tables located at the following website:

www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html.

Mitigation Measures for Operational Air Quality Impacts

3. The lead agency's operational air quality analysis demonstrates significant air quality impacts from all criteria pollutant emissions (i.e., NO_x, SO_x, CO, VOC, PM₁₀ and PM_{2.5}). These impacts are primarily from mobile source emissions related to vehicle trips associated with the proposed project. However, the lead agency does not adequately address this large source of emissions. Specifically, the lead agency only requires a list of nominal non-quantifiable mitigation measures that are deferred to project level analyses. Therefore, the lead agency should reduce the project's significant air quality impacts by reviewing and incorporating additional transportation mitigation measures, such as those from the greenhouse gas quantification report published by the California Air Pollution Control Officer's Association in the Final EIR¹.

Additional Mitigation Measures for Industrial and Warehouse Land Uses

4. Given that the proposed project includes the placement of new industrial uses in close proximity to sensitive land uses the AQMD staff recommends that the lead agency consider adding the following mitigation measures to further reduce air quality impacts from the operation phase of the project, if feasible:
 - Provide a more aggressive phase-in of cleaner heavy duty trucks (such as 2010 model year) than currently required by CARB regulations for projects in this area with existing air quality concerns,
 - Design warehouse/distribution center entrances and exits such that trucks are not traversing past neighbors or other sensitive receptors,
 - Design warehouse/distribution centers such that any check-in point for trucks is well inside the facility property to ensure that there are no trucks queuing outside of the facility,
 - Develop, adopt and enforce truck routes both in an out of city and in and out of facilities,
 - Establish area(s) within facilities for repair needs,
 - Have truck routes clearly marked with trailblazer signs, so that 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,
 - Provide food options, fueling, truck repair and or convenience stores on-site to minimize the need for trucks to traverse through residential neighborhoods,
 - Improve traffic flow by signal synchronization,

¹ California Air Pollution Control Officer's Association. August 2010. Quantifying Greenhouse Gas Mitigation Measures. Accessed at: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

- Require or provide incentives for particulate traps that meet CARB certified level 3 requirements, and
- Electrify service equipment at facilities.