



South Coast Air Quality Management District

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Review of the Draft Environmental Impact Report for the Colton Hub City Centre Specific Plan

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are intended to provide guidance to the lead agency and should be incorporated into the revised or final Environmental Impact Report as appropriate.

Based on a review of the Draft EIR the SCAQMD staff is concerned about the significant construction and operations related air quality impacts from the proposed project. Specifically, the lead agency determined that the project will exceed the SCAQMD's CEQA regional significance thresholds for VOC, NO_x and CO during construction of the Project, and VOC, NO_x, CO, PM₁₀ and PM_{2.5} thresholds during operations. In addition, the lead agency has determined that health risk due to impacts from diesel particulate matter (DPM) generated by traffic on the I-10 freeway and from the Union Pacific Colton railyard will exceed SCAQMD significance thresholds at both residential and commercial receptor locations. As a result, the SCAQMD staff recommends that pursuant to Section 15126.4 of the CEQA Guidelines the lead agency require the following revisions and/or additions to the mitigation measures identified in the Draft EIR.

Additional Construction Mitigation Measures

- Construct or build with materials that do not require painting or use pre-painted construction materials.
- Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export).
- Require construction equipment to be outfitted with BACT devices certified by CARB.
 - ✓ 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 SCAQMD “SOON” funds. Incentives could be provided for those construction contractors who apply for SCAQMD “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>

Additional Operational Mitigation Measures - Energy Efficiency

- Maximize use of solar energy including solar panels; installing the maximum possible number of solar energy arrays on the building roofs and/or on the Project site to generate solar energy for the facility.
- Require all lighting fixtures, including signage, to be the most energy efficient possible, require that new traffic signals have light-emitting diode (LED) bulbs, and require that light fixtures be energy efficient compact fluorescent and/or LED light bulbs. Where feasible use solar powered lighting.
- Use light colored paving and roofing materials.
- Use passive heating, natural cooling, solar hot water systems, and reduced pavement.
- Limit the hours of operation of outdoor lighting.
- Utilizing only Energy Star heating, cooling, and lighting devices, and appliances.

Additional Operational Mitigation Measures - Transportation

- Provide electric car charging stations for tenants (not just electric vehicle wiring per local ordinance). Also, provide designated areas for parking of zero emission vehicles (ZEVs) for car-sharing programs.
- Provide incentives to encourage public transportation and carpooling.
- Provide incentives for employees and the public to use public transportation such as discounted transit passes, reduced ticket prices at local events, and/or other incentives.
- Implement a rideshare program for employees at retail/commercial sites.
- Create local “light vehicle” networks, such as neighborhood electric vehicle (NEV) systems.
- Require the use of 2010 compliant diesel trucks, or alternatively fueled, delivery trucks (e.g., food, retail and vendor supply delivery trucks) at commercial/retail sites upon project build-out. If this isn’t feasible, consider other measures such as incentives, phase-in schedules for clean trucks, etc.

Additional Operational Mitigation Measures - Other

- Require use of water-based or low VOC cleaning products.
- Provide outlets for electric and propane barbecues in residential areas.
- Require use of electric lawn mowers and leaf blowers.
- Require use of electric or alternatively fueled sweepers with HEPA filters.
- Require the use of electric or alternative fueled maintenance vehicles.
- Consider relocating residences further away from the I-10 freeway and the Union Pacific railyard, such that impacts from DPM emissions generated by these sources are reduced at all residential locations to lower than significance thresholds.

Pursuant to Public Resources Code Section 21092.5, SCAQMD staff requests that the lead agency provide the SCAQMD 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 Bob Gottschalk, Air Quality Specialist, at (909) 396-2456, if you have any questions regarding the enclosed comments.

Sincerely,



Ed Eckerle
Program Supervisor
Planning, Rule Development & Area Sources

EE:BG

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