



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • [www.aqmd.gov](http://www.aqmd.gov)

SENT VIA E-MAIL AND USPS:

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[rlopez@jurupavalley.org](mailto:rlopez@jurupavalley.org)

Rocio Lopez, Senior Planner  
City of Jurupa Valley  
8930 Limonite Avenue  
Jurupa Valley, California 92509-5183

## **Draft Environmental Impact Report (EIR) for the Proposed Rubidoux Commercial Development Project (MA15146)**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comment is meant as guidance for the Lead Agency and should be incorporated into the Final EIR.

### SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to build nine industrial tilt-up buildings totaling 306,894 square feet on 26.4 acres (Proposed Project). The Proposed Project is expected to generate 279 truck trips per day<sup>1</sup>. Construction is expected to take less than two years beginning in October 2018 and ending in May 2020<sup>2</sup>.

### SCAQMD Staff's Comments

In the Air Quality Analysis, the Lead Agency quantified the Proposed Project's construction and operational emissions and compared them to SCAQMD air quality CEQA regional and localized thresholds of significance. The Lead Agency found that the Proposed Project's short-term and long-term air quality impacts would be less than significant. Additionally, while the Lead Agency discussed the California Air Resources Board's (CARB) *Air Quality and Land Use Handbook* in the Draft EIR, the Lead Agency did not conduct a health risk assessment (HRA) analysis. Since the Proposed Project is an industrial development that is capable of generating and attracting vehicle trips, especially heavy-duty diesel-fueled vehicles (e.g., 270 truck trips per day), it is recommended that the Lead Agency perform a mobile source HRA analysis, compare the Proposed Project's maximum cancer risk to SCAQMD CEQA significance threshold of 10 in one million for cancer risk to determine the level of significance, and identify mitigation measures if the risk is found to be significant. Guidance for performing a mobile source health risk assessment ("*Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*") can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>. This comment was included in the SCAQMD staff's comments on the Notice of Preparation for the Proposed Project<sup>3</sup>.

Should the Lead Agency find, after conducting a HRA analysis, that the Proposed Project would result in significant cancer risks, mitigation measures will be required. SCAQMD staff has identified the following feasible mitigation measures as possible guidance to the Lead Agency that should be incorporated in the Final EIR.

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<sup>1</sup> Draft EIR. Page 4.1-27

<sup>2</sup> Draft EIR. Table 3-3. Page 3-17.

<sup>3</sup> South Coast Air Quality Management District. May 12, 2017. Staff comment letter on the Notice of Preparation of an Environmental Impact Report for the Proposed Project. Accessed at: <http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2017/nop-rubidoux-051217.pdf>.

Mitigation Measures for Operational Air Quality Impacts from Mobile Sources

- Require the use of 2010 and newer haul trucks (e.g., material delivery trucks and soil import/export). In the event that that 2010 model year or newer diesel haul trucks cannot be obtained, provide documentation as information becomes available and use trucks that meet EPA 2007 model year NOx emissions requirements<sup>4</sup>, at a minimum. Additionally, consider other measures such as incentives, phase-in schedules for clean trucks, etc.
- Have truck routes clearly marked with trailblazer signs, so that trucks will not enter residential areas.
- Limit the daily number of trucks allowed at the Proposed Project to levels analyzed in the CEQA document (279 truck trips per day). 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 land use or higher activity level.
- Provide electric vehicle (EV) Charging Stations (see the discussion below regarding EV charging stations).
- Should the Proposed Project generate significant regional emissions, the Lead Agency should require mitigation that requires accelerated phase-in for non-diesel powered trucks. For example, natural gas trucks, including Class 8 HHD trucks, are commercially available today. Natural gas trucks can provide a substantial reduction in health risks, and may be more financially feasible today due to reduced fuel costs compared to diesel. In the Final CEQA document, the Lead Agency should require a phase-in schedule for these cleaner operating trucks to reduce any significant adverse air quality impacts. SCAQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency.
- Trucks that can operate at least partially on electricity have the ability to substantially reduce the significant NOx impacts from this project. Further, trucks that run at least partially on electricity are projected to become available during the life of the project as discussed in the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS)<sup>5</sup>. It is important to make this electrical infrastructure available when the project is built so that it is ready when this technology becomes commercially available. The cost of installing electrical charging equipment onsite is significantly cheaper if completed when the project is built compared to retrofitting an existing building. Therefore, SCAQMD staff recommends the Lead Agency require the Proposed Project and other plan areas that allow truck parking to be constructed with the appropriate infrastructure to facilitate sufficient electric charging for trucks to plug-in. Similar to the City of Los Angeles requirements for all new projects, SCAQMD staff recommends that the Lead Agency require at least 5% of all vehicle parking spaces (including for trucks) include EV charging stations<sup>6</sup>. Further, electrical hookups should be provided at the onsite truck stop for truckers to plug in any onboard auxiliary equipment. At a minimum, electrical panels should appropriately sized to allow for future expanded use.
- Design the industrial building such that trucks are not traversing or travelling past neighbors or other sensitive receptors.
- Design the industrial building such that any check-in point for trucks is well inside the Proposed Project site to ensure that there are no trucks queuing outside of the facility.
- Design the industrial building to ensure that truck traffic within the Proposed Project site is located away from the property line(s) closest to its residential or sensitive receptor neighbors.
- Restrict overnight parking in residential areas.
- Establish overnight parking within the industrial building where trucks can rest overnight.

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<sup>4</sup> Based on a review of the California Air Resources Board's diesel truck regulations, 2010 model year diesel haul trucks should have already been available and can be obtained in a successful manner for the project construction California Air Resources Board. March 2016. Available at: <http://www.truckload.org/tca/files/ccLibraryFiles/Filename/00000003422/California-Clean-Truck-and-Trailer-Update.pdf> (See slide #23).

<sup>5</sup> Southern California Association of Governments. Accessed at: <http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx>.

<sup>6</sup> City of Los Angeles. Accessed at: [http://ladbs.org/LADBSWeb/LADBS\\_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf](http://ladbs.org/LADBSWeb/LADBS_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf).

- Establish area(s) within the Proposed Project site for repair needs.
- Develop, adopt and enforce truck routes both in and out of city, and in and out of facilities.

*Mitigation Measures for Operational Air Quality Impacts from Air Sources*

- 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.
- Maximize the planting of trees in landscaping and parking lots.
- Use light colored paving and roofing materials.
- Utilize only Energy Star heating, cooling, and lighting devices, and appliances.
- Install light colored “cool” roofs and cool pavements.
- Require use of electric or alternatively fueled sweepers with HEPA filters.
- Use of water-based or low VOC cleaning products.

Closing

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), SCAQMD staff requests that the Lead Agency provide SCAQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful or useful to decision makers and to the public who are interested in the Proposed Project.

SCAQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact me at [lsun@aqmd.gov](mailto:lsun@aqmd.gov) if you have any questions.

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

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