



South Coast Air Quality Management District

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

SENT VIA E-MAIL AND USPS:

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dcasey@rialto.ca.gov

Daniel Casey, Senior Planner
City of Rialto, Development Services Department
150 South Palm Avenue
Rialto, California 92376

Mitigated Negative Declaration (MND) for the Proposed Bridge Point North Rialto Project

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document¹. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final MND.

South Coast AQMD Staff's Summary of Project Description

The Lead Agency proposes to demolish 1,532 square feet of existing on-site buildings and construct a 382,018-square-foot on 15.95 acres (Proposed Project). The Proposed Project is located on the northeast corner of North Locust Avenue and West Norwood Street within the City of Rialto. Construction of the Proposed Project is anticipated to begin in February of 2020 for 18 months². During operation, the Proposed Project will generate 544 daily truck trips³. Upon review of the MND and aerial photographs, South Coast AQMD staff found that sensitive receptors (i.e., residences) are located within 50 feet of the Proposed Project⁴.

South Coast AQMD Staff's Summary of the Air Quality Analysis

In the Air Quality Analysis Section, the Lead Agency quantified the Proposed Project's construction and operational emissions and compared those emissions to South Coast AQMD's recommended regional and localized air quality CEQA significance thresholds. Based on the analysis, the Lead Agency found that the Proposed Project's regional construction and operational impacts would be less than significant⁵. The Lead Agency also prepared a mobile source Health Risk Assessment (HRA) and found that the Proposed Project's individual maximum cancer risk would be 6.2 in one million⁶, which would be below South Coast AQMD's CEQA significance threshold of 10 in one million for cancer risk⁷. Although the Lead Agency found that construction and operational air quality impacts would be less than significant, the Lead Agency included Mitigation Measures (MMs) AQ-1 and AQ-2⁸. MM-AQ-1 discusses compliance South Coast AQMD Rule 402 – Nuisance⁹ and Rule 403 – Fugitive Dust¹⁰, which requires dust

¹ On March 20, 2019, the Lead Agency circulated a MND for the proposed Bridge Point North Rialto Project for public review and comments. On April 3, 2019, South Coast AQMD staff provided comments on the MND, which can be found on South Coast AQMD's webpage, at: <http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2019/april/SBC190322-13.pdf>.

² MND. Section II. Description of the Proposed Project. Page 17.

³ *Ibid.* Section IV.17 Transportation/Traffic. Table 30. Summary of Project Trip Generation. Page 103.

⁴ *Ibid.* Section IV.3. Air Quality. Page 26.

⁵ *Ibid.* Pages 19 through 30.

⁶ *Ibid.* Page 30.

⁷ South Coast AQMD has developed the CEQA significance threshold of 10 in one million for cancer risk. When South Coast AQMD acts as the Lead Agency, South Coast AQMD staff conducts a HRA, compares the maximum cancer risk to the threshold of 10 in one million to determine the level of significance for health risk impacts, and identifies mitigation measures if the risk is found to be significant.

⁸ *Ibid.*

⁹ South Coast AQMD Rule 402 – Nuisance. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>.

prevention measures such as watering the construction site every three hours. MM-AQ-2 discusses compliance with South Coast AQMD Rule 1113 – Architectural Coatings¹¹, which requires use of architectural coatings that have a limited reactive organic gas content.

South Coast AQMD Staff's General Comments

Upon review of the MND, South Coast AQMD staff found that daily vehicle trips estimated by CalEEMod is not consistent with the information provided in the project-specific Traffic Impact Analysis (TIA). This could have led to an underestimation of the Proposed Project's operational air quality impacts from mobile sources. Please see the attachment for more information. Additionally, South Coast AQMD staff has comments on the HRA modeling parameters. Please see the attachment for more information. Finally, in addition to MM-AQ-1 and MM-AQ-2, the attachment includes additional mitigation measures that the Lead Agency should review and incorporate in the Final MND.

Conclusion

Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process. Please provide South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, responses should provide sufficient details 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 do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and the public who are interested in the Proposed Project. Further, when the Lead Agency makes the finding that the additional recommended mitigation measures are not feasible, the Lead Agency should describe the specific reasons for rejecting them in the Final MND (CEQA Guidelines Section 15091).

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Alina Mullins, Assistant Air Quality Specialist, at amullins@aqmd.gov or (909) 396-2402, should you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment
LS:AM
SBC191010-01
Control Number

¹⁰ South Coast AQMD Rule 403 – Fugitive Dust. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf>.

¹¹ South Coast AQMD. Rule 1113 – Architectural Coatings. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf>.

ATTACHMENT

Air Quality Analysis – Trip Generation Rate

1. In the TIA for the MND, the Lead Agency used the trip generation rate of 3.56 from the Institute of Transportation Engineers Trip Generation Manual, 9th Edition, 2012 (ITE Manual) for Land Use Code 150, Warehousing¹². Using this trip generation rate, the Lead Agency found that the Proposed Project would generate 1,360 vehicle trips per day¹³. However, upon review of the CalEEMod output files, South Coast AQMD staff found that the Lead Agency did not adjust the trip generation rate in CalEEMod to be consistent with the trip generation rate of 3.56 in the project-specific TIA. For warehouse land uses, CalEEMod version 2016.3.2 generates a default trip generation rate of 1.68 based on the ITE Manual¹⁴. When the CalEEMod default trip generation rate is used, it results in 641 daily vehicle trips, which is substantially short of 1,360 daily vehicle trips. (See Table 1: South Coast AQMD staff's Estimated Daily Trips Based on ITE Land Use Codes 150 and 152). Therefore, South Coast AQMD staff recommends that the Lead Agency use the project-specific trip generation rate from the TIA in CalEEMod to recalculate the Proposed Project's operational emissions, or provide a justification for using the CalEEMod default trip generation rate.

Table 1: South Coast AQMD staff's Estimated Daily Trips Based on ITE Land Use Codes 150 and 152¹

	ITE 9 th Edition Land Use Code	ITE 9 th Edition Trip Generation Rate ²	Estimated Daily Vehicle Trips ³
Proposed Project	150	3.56 (from the project-specific TIA for the Proposed Project)	1,360
CalEEMod	152	1.68 (from CalEEMod default)	641
Difference in Estimated Daily Vehicle Trips:			718

Source: South Coast AQMD. October 23, 2019.

Notes: 1. The table was generated by South Coast AQMD staff based on the information from the Bridge Point North Rialto MND and ITE, Trip Generation Manual, 9th Edition, 2012. 2. Trip Generation Rate per 1,000 square feet (tsf). 3. Vehicle Daily Trips were calculated by multiplying the Proposed Project's square footage (382,018 sf/1000 or 545.735 tsf) with the associated trip generation rate.

Air Quality Analysis – Health Risk Assessment

2. Upon review of the Health Risk Assessment in Appendix A: Air Quality, Greenhouse Gas Emissions Assessment, and Health Risk Assessment¹⁵, South Coast AQMD staff found that the Lead Agency used the daily breathing rates for each age group representative of mean daily breathing rates. South Coast AQMD staff recommends that when there are different daily breathing rates for the same age bin, the most appropriate and conservative daily breathing rates, such as the 95th percentile daily breathing rates, should be used. Therefore, South Coast AQMD staff recommends that the Lead Agency revise the HRA to use the most conservative daily breathing rates to calculate cancer risk.

Guidance on Siting Sensitive Receptors Near a High-Volume Freeway and Other Sources of Air Pollution

3. South Coast AQMD staff recognizes that there are many factors Lead Agencies must consider when making local planning and land use decisions. To facilitate stronger collaboration between Lead Agencies and South Coast AQMD to reduce community exposure to source-specific and cumulative

¹² MND. Section 17. Transportation/Traffic. Page 103.

¹³ *Ibid.*

¹⁴ CalEEMod User Guide. Appendix D: Default Data Tables.

¹⁵ *Ibid.* Appendix A: Air Quality, Greenhouse Gas Emissions Assessment, and Health Risk Assessment. Rialto Annexation Risk Calculations. PDF Page 397.

air pollution impacts, South Coast AQMD adopted the *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning* in 2005¹⁶. This Guidance document provides recommended policies that local governments can use in their General Plans or through local planning to prevent or reduce potential air pollution impacts and protect public health. In addition, guidance on siting incompatible land uses (such as distribution centers near residences) can be found in the California Air Resources Board's *Air Quality and Land Use Handbook: A Community Health Perspective*, which can be found at: <http://www.arb.ca.gov/ch/handbook.pdf>. Due to close proximity of the residences to the Proposed Project (within 50 feet), South Coast AQMD staff recommends that the Lead Agency review and consider these guidance when making local planning and land use decisions

Recommended Mitigation Measures for Operational Air Quality Impacts from Mobile Sources:

4. In the event that, after revisions to the Air Quality Analysis based on Comment Nos. 1 and 2, that the Proposed Project will result in significant adverse air quality impacts during operation that cannot be reduced to less than significant after the implementation of MM-AQ-1 and MM-AQ-2, additional feasible mitigation measures will be required (CEQA Guidelines Section 15070). South Coast AQMD staff has identified the following air quality mitigation measures during operation that the Lead Agency should review and incorporate in the Final MND. For more information on potential mitigation measures as guidance to the Lead Agency, please visit South Coast AQMD's CEQA Air Quality Handbook website¹⁷.

- Require the use of zero emission (ZE) or near-zero emission (NZE) heavy-duty trucks during operation, such as trucks with natural gas engines that meet CARB's adopted optional NOx emission standard of 0.02 grams per brake horsepower-hour (g/bhp-hr). At a minimum, require that operators of heavy-duty trucks visiting the Proposed Project during operation commit to using 2010 model year¹⁸ or newer engines that meet CARB's 2010 engine emission standards of 0.01 g/bhp-hr for particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks. Include analyses to evaluate and identify sufficient power available for ZE trucks and supportive infrastructures in the Energy and Utilities and Service Systems Sections of the Final MND, where appropriate.

To monitor and ensure ZE, NZE, or 2010 model year trucks are used at the Proposed Project, the Lead Agency should require that operators maintain records of all trucks associated with the Proposed Project's operation, and make these records available to the Lead Agency upon request. The records will serve as evidence to prove that each truck called to the Proposed Project during operation meets the minimum 2010 model year engine emission standards. Alternatively, the Lead Agency should require periodic reporting and provision of written records by operators, and conduct regular inspections of the records to the maximum extent feasible and practicable.

- Create a buffer zone of at least 300 meters (roughly 1,000 feet), which can be office space, employee parking, greenbelt, etc. between the Proposed Project and sensitive receptors (e.g., residences), where feasible.

¹⁶ South Coast AQMD. May 2005. "Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning" Accessed at: <http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf>.

¹⁷ South Coast AQMD. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.

¹⁸ CARB adopted the statewide On-Road Truck and Bus Regulation in 2010. The Regulation requires diesel trucks and buses that operate in California to be upgraded to reduce emissions. Newer heavier trucks and buses must meet particulate matter filter requirements beginning January 1, 2012. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent. More information on the CARB's Truck and Bus Regulations is available here: <https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm>.

- Design the Proposed Project such that entrances and exits are such that trucks are not traversing past residences, and other sensitive receptors near the Proposed Project.
- Design the Proposed Project 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 and ensure that truck traffic within the Proposed Project site is located away from the property line(s) closest to the sensitive receptors (e.g., residences), which are within 50 feet of the Proposed Project.
- Limit the daily number of truck trips allowed at the Proposed Project to the level that was analyzed in the Final MND (e.g., 544 daily truck trips). If higher daily truck volumes are anticipated during operation than what was analyzed in the certified Final MND, the Lead Agency should commit to re-evaluating the Proposed Project's air quality and health risks impacts through a CEQA process prior to allowing higher activity levels (CEQA Guidelines Section 15162).
- Require trucks to use the truck routes that were used to analyze the air quality and HRA impacts in the Final MND.
- Have truck routes clearly marked with trailblazer signs, so that trucks will not enter residential areas that are adjacent to portions of the designated truck routes analyzed in the Final MND.
- Restrict overnight truck parking in residential areas. Establish parking within the Proposed Project where trucks can rest overnight.
- Establish area(s) within the Proposed Project site for repair needs and ensure that these designated areas are away from any sensitive land uses.