



# South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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City of Corona, Community Development Department

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## **Mitigated Negative Declaration (MND) for the Proposed Latitude Business Park Project (SCH No.: 2020019017)**

South Coast Air Quality Management District (South Coast AQMD) staff 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 MND.

### South Coast AQMD Staff's Summary of Project Description

The Lead Agency proposes to construct 10 buildings totaling 752,889 square feet on 46 acres and five buildings totaling 321,882 square feet on 28 acres for a total of 15 buildings for industrial, manufacturing, cold and non-cold storage warehousing uses totaling 1,074,771 square feet on 75 acres (Proposed Project). The Proposed Project is located on the northwest corner of Temescal Canyon Road and Tom Barnes Street in the City of Corona. Construction of the Proposed Project is anticipated to begin in January 2020 and by completed by 2021<sup>1</sup>. Once operational, the Proposed Project will have 66<sup>2</sup> dock doors and involve 305 two-way truck trips per day for the manufacturing and warehouse<sup>3</sup>. Based on reviews of *Aerial View of Project Site*<sup>4</sup> in the MND and aerial photographs, the Proposed Project is located immediately south of the existing residential uses<sup>5</sup>.

### South Coast AQMD Staff's Summary of the Air Quality and Health Risk Assessment Analyses

The Lead Agency quantified the Proposed Project's construction and operational emissions and compared those emissions to South Coast AQMD's recommended regional CEQA air quality significance thresholds. Based on the analysis, the Lead Agency found that the Proposed Project's regional construction and operational air quality impacts would be less than significant<sup>6</sup>. The Lead Agency is committed to implementing Mitigation Measure 5-1, which requires the use of Tier 4 diesel construction equipment<sup>7</sup>. The Lead Agency performed air dispersion modeling to analyze the Proposed Project's localized construction air quality impacts for NO<sub>x</sub> and PM<sub>10</sub> and compared those with the most stringent air quality standards<sup>8</sup>. The Lead Agency found that construction activities would not result in significant localized air quality impacts for NO<sub>x</sub> and PM<sub>10</sub><sup>9</sup>. Additionally, the Lead Agency performed a construction health risk assessment (HRA) analysis and found that construction of the Proposed Project

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<sup>1</sup> MND. Page 14.

<sup>2</sup> *Ibid.* Page 32.

<sup>3</sup> *Ibid.* Supplemental Traffic Impact Analysis. Table A: Updated Project Trip Generation Forecast. PDF Page 6.

<sup>4</sup> *Ibid.* Page 3.

<sup>5</sup> *Ibid.*

<sup>6</sup> *Ibid.* Latitude Business Park Air Quality Assessment. Page 25.

<sup>7</sup> MND. Page 14.

<sup>8</sup> South Coast AQMD. Localized Significance Threshold Methodology. Page 2-9. Accessed on January 31, 2020. Accessed at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf>.

<sup>9</sup> MND. Page 15.

would result in an excess inhalation cancer risk of 7.24 in one million for 70-year exposure duration<sup>10</sup>, which would not exceed South Coast AQMD's CEQA significance threshold of 10 in one million for cancer risk<sup>11</sup>.

#### Summary of South Coast AQMD Staff's Comments

The Notice of Completion for the MND was circulated for a 30-day public and comment period from January 8, 2020 to February 8, 2020. However, the MND was not provided to South Coast AQMD staff for review after it was released for public review. On January 21, 2020, South Coast AQMD staff contacted the Lead Agency and requested the MND and air quality and HRA analyses technical data<sup>12</sup>. South Coast AQMD staff received the MND and technical data that were needed to complete the review on January 23, 2020, two weeks after the MND was circulated for public review. As a CEQA commenting agency for the Proposed Project, South Coast AQMD staff reviews air quality and HRA analyses in CEQA documents to ensure emissions and health risks are adequately and sufficiently evaluated, disclosed, and mitigated to the maximum extent feasible. As such, the Lead Agency should provide the MND to South Coast AQMD staff for review upon completion and public release.

Based on reviews of the MND and technical documents, South Coast AQMD staff has nine comments on the air quality and HRA analyses. A summary of these comments is provided as follows with additional details provided in the attachment.

1. Localized Significance Thresholds Analysis for CO and PM2.5: The Lead Agency performed air dispersion modeling to analyze the Proposed Project's localized construction air quality impacts for NOx and PM10 and compared those with the most stringent air quality standards to determine the level of significance<sup>13</sup>. However, the Lead Agency did not analyze the localized air quality impacts for CO or PM2.5 in the MND. South Coast AQMD staff recommended that the Lead Agency analyze the Proposed Project's localized air quality impacts from construction activities for CO and PM2.5 and compare those emissions to the most stringer air quality standards, or provide reasons for not including the analysis supported by substantial evidence in the Final MND.
2. Cold Storage Facilities: Based on reviews of the MND and the *Air Quality Assessment*, South Coast AQMD staff found that the "unrefrigerated warehouse-no rail" land use category was selected in CalEEMod to quantify emissions. Since one of the uses for the Proposed Project is cold storage facilities, it is reasonably foreseeable that transport refrigeration units (TRUs) may be used at the Proposed Project. To conservatively analyze a worst-case impact scenario from the use of TRUs during operation, the Lead Agency should calculate the Proposed Project's emissions from TRUs that will visit the Proposed Project or provide justification for not including the calculation in the Find MND.
3. Project Trip Generation Forecast: The MND and technical appendices included two project trip generation forecast numbers. South Coast AQMD staff recommends that the Lead Agency clarify

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<sup>10</sup> *Ibid.*

<sup>11</sup> 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 measures if the risk is found to be significant.

<sup>12</sup> E-mail correspondence on January 21, 2020 from South Coast AQMD staff (Ms. Lijin Sun) to Lead Agency (Ms. Joanne Coletta).

<sup>13</sup> South Coast AQMD Localized Significance Threshold Methodology. Page 2-9. Accessed on January 31, 2020. Accessed at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf>.

which project trip generation forecast was used to quantify the Proposed Project's emissions from mobile sources and revise the air quality analysis based on one project trip generation forecast.

4. Air Quality Impact Analysis – Vehicle Miles Traveled: The Lead Agency used a trip length of 9.37 miles to quantify the Proposed Project's operational emissions from mobile sources, but did not discuss how this trip length was calculated in the MND. South Coast AQMD staff recommends that the Lead Agency provide additional information in the Final MND as substantial evidence to support the use of 9.37 miles.
5. Fleet Mix: The Lead Agency prepared a traffic impact analysis to identify the fleet mix specific for the Proposed Project. However, based on reviews of the *Air Quality Assessment* technical appendix, South Coast AQMD staff found that the Lead Agency used the default fleet mix in CalEEMod, which is different from the project-specific fleet mix. South Coast AQMD staff recommends that the Lead Agency re-calculate the Proposed Project's emissions by using project-specific fleet mix in the Final MND. If it is more appropriate to use the default fleet mix to quantify the Proposed Project's emissions than project-specific fleet mix from the traffic impact analysis, the Lead Agency should include an explanation in the Final MND.
6. Health Risk Assessment Analysis during Operation: Operation of the Proposed Project generates and attracts heavy-duty, diesel-fueled trucks. Although the Lead Agency prepared a construction HRA analysis to analyze health risk impacts to nearby residents from construction activities, health risks to residents during the operational phase were not analyzed and should be included in the Final MND.
7. Guidance Regarding Warehouses Sited Near Sensitive Receptors: South Coast AQMD staff recognizes that there are many factors Lead Agencies must consider when making local planning and land use decisions. For warehouses that accommodate more than 100 trucks per day, or more than 40 trucks with operating TRUs per day, California Air Resources Board (CARB) recommends a 1,000-foot separation between sensitive land uses (e.g., residential uses)<sup>14</sup> and the operating warehouse. Therefore, South Coast AQMD staff recommends that the Lead Agency review and consider the guidance when making local planning and land use decisions.
8. Additional Recommended Mitigation Measures: In the MND, the Lead Agency provided information about nearby electric vehicle (EV) charging stations that could be used by employees during operation. The Lead Agency should require EV charging stations be provided on the Proposed Project site, or at a minimum, require appropriate infrastructure to facilitate sufficient EV charging stations. Additionally, to further reduce the Proposed Project's construction and long-term emissions, South Coast AQMD staff recommends a list of new mitigation measures that the Lead Agency should review and incorporate in the Final MND.
9. South Coast AQMD Rule, Permit, and Responsible Agency: Since the Proposed Project is greater than 50 acres, it is subject to specific requirements under South Coast AQMD Rule 403(e) and should be discussed in the Final MND. Additional information on South Coast AQMD permits is included as resources to the Lead Agency.

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<sup>14</sup> CARB. *Air Quality and Land Use Handbook: A Community Health Perspective*. Page 4. Accessed at: <https://www.arb.ca.gov/ch/handbook.pdf>.

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 supported by substantial evidence for rejecting them in the Final MND (CEQA Guidelines Sections 15070 and 15074.1).

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 Margaret Isied, Assistant Air Quality Specialist, at [misied@aqmd.gov](mailto:misied@aqmd.gov) or (909) 396-2543, should you have any questions.

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment

LS:MI

RVC200121-01

Control Number

## ATTACHMENT

### **1. Localized Significance Thresholds Analysis for CO and PM2.5**

In the Air Quality Section of the MND, the Lead Agency performed air dispersion modeling to analyze the Proposed Project's localized construction air quality impacts for NOx and PM10 and compared those with the most stringent air quality standards to determine the level of significance<sup>15</sup>. However, the Lead Agency did not analyze localized construction air quality impacts from CO or PM2.5. To ensure nearby residents living north to the Proposed Project will not be adversely impacted by construction activities, the Lead Agency should analyze the Proposed Project's localized air quality impacts from construction activities for CO and PM2.5 and compare those emissions to the most stringent air quality standards to determine the level of significance in the Final MND. If the localized significance thresholds analysis for CO and PM2.5 are not included in the Final MND, the Lead Agency should provide reasons for not including the analysis supported by substantial evidence in the record.

### **2. Cold Storage Facilities**

Since one of the warehouse uses for the Proposed Project is cold storage facilities, it is reasonably foreseeable that transport refrigeration units (TRUs), which are commonly in-use at cold storage warehouses, may be used at the Proposed Project. However, based on reviews of the MND and the *Air Quality Assessment*, South Coast AQMD staff found that the "unrefrigerated warehouse-no rail"<sup>16</sup> land use was used to quantify the Proposed Project's operational emissions. If using TRUs is reasonably foreseeable during operation, and to conservatively analyze the worst-case impact scenario, the Lead Agency should calculate the Proposed Project's emissions from TRUs in the Final MND or provide reasons for not quantifying emissions from TRUs in the Final MND as substantial evidence in the record.

### **3. Project Trip Generation Forecast**

Based on reviews of the MND and technical appendices, South Coast AQMD staff found two project trip generation forecasts within the MND and between the MND and the technical appendices. (See Table A). Therefore, South Coast AQMD staff was unable to determine which project trip generation forecast was used to estimate the Proposed Project's operational emissions. South Coast AQMD staff recommends that the Lead Agency clarify the project trip generation forecast and update the air quality analysis based on one project trip generation forecast consistent throughout the Final MND and technical appendices.

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<sup>15</sup> South Coast AQMD Localized Significance Threshold Methodology. Page 2-9. Accessed on January 31, 2020. Accessed at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-1st-methodology-document.pdf>.

<sup>16</sup> MND. Air Quality Assessment. Page 87.

**Table A: Project Trip Generation Forecast Value Inconsistencies**

Document Type	Section	Page No.	Project Trip Generation Forecast (per day)
MND	Operational Emissions	Page 15	4,127
MND	Intersection Queue Length Analysis	Page 18	3,585
Traffic Impact Analysis (TIA) Technical Appendix	Table 5-1: Project Trip Generation Rates and Forecast under the row titled "Project Total Trip Generation Forecast"	Page 16	4,127
Supplemental TIA Memo	Table A: Updated Project Trip Generation Forecast	Page 6	3,585
Air Quality Assessment Technical Appendix	Table 5-1: Project Trip Generation Rates and Forecast under the row titled "Project Total Trip Generation Forecast"	Page 19	4,127

**Source:** South Coast AQMD staff. February 5, 2020.

#### **4. Air Quality Impact Analysis – Vehicle Miles Traveled**

Based on reviews of the Air Quality Assessment Technical Appendix to the MND, South Coast AQMD staff found that the Lead Agency used a trip length of 9.37<sup>17</sup> miles to quantify the Proposed Project's operational emissions from mobile sources, including truck trips, but did not discuss how this trip length was calculated. CalEEMod is the software model that quantify land use projects' emissions. The Lead Agency used CalEEMod to quantify the Proposed Project's construction and operational emissions. Appendix A of the CalEEMod User Manual provides the equation for calculating the average overall trip length. The equation is to divide the average daily trip rate by the vehicle miles traveled (VMT)<sup>18</sup>. The Lead Agency estimated operation of the Proposed Project would result in 54,140 VMT<sup>19</sup>. If the Proposed Project generates 4,127 trips per day, the average trip length would equal to 13.12 miles (54,140 VMT/4,127 daily trips). If the Proposed Project generates 3,585 trips per day, the average trip length would equal to 15.10 miles (54,140 VMT/3,585 daily trips). (See also Comment No. 3). Since the MND and technical appendices did not explain how a 9.37-mile trip length was calculated from 54,140 VMT, South Coast AQMD staff recommends that the Lead Agency provide additional information in the Final MND as substantial evidence to support the use of 9.37 miles to quantify emissions from truck trips.

#### **5. Fleet Mix**

The Lead Agency prepared a traffic impact analysis technical appendix to identify trip generation rates and fleet mix that were specific for operation of the Proposed Project. However, in the air quality assessment technical appendix, the Lead Agency used the default fleet mix values to quantify emissions from mobile sources. South Coast AQMD staff recommends that the Lead Agency recalculate the Proposed Project's emissions by using project-specific fleet mix in the Final MND. If it is more appropriate to use the default fleet mix to quantify the Proposed Project's emissions than project-specific fleet mix from the traffic impact analysis, the Lead Agency should include an explanation in the Final MND.

#### **6. Health Risk Assessment Analysis during Operation**

Sensitive receptors are people that have an increased sensitivity to air pollution or environmental contaminants. Sensitive receptors include schools, daycare centers, nursing homes, elderly care

<sup>17</sup> MND. Air Quality Assessment. Page 57.

<sup>18</sup> CalEEMod. Appendix A. Vehicle Miles Traveled, Page 22. Accessed at: <http://www.aqmd.gov/docs/default-source/caleemod/caleemod-appendixa.pdf>

<sup>19</sup> MND. Air Quality Assessment. Page 19.



facilities, hospitals, and residential dwelling units. As stated above, the Proposed Project involves operation of manufacturing and warehouse uses that will generate approximately 305 truck trips per day. Based on reviews of *Aerial View of Project Site*<sup>20</sup> in the MND and aerial photographs, South Coast AQMD staff found that existing residential uses are located immediately north of the Proposed Project. Surrounding sensitive receptors (e.g., residents) would be exposed to diesel particulate matter (DPM) from the transportation and idling of heavy-duty, diesel-fueled trucks visiting the Proposed Project. DPM has been identified by the CARB as a toxic air contaminant (TAC) based on its carcinogenic effects<sup>21</sup>. However, upon review of the MND, South Coast AQMD staff found that the Lead Agency did not perform a quantitative mobile source HRA analysis.

One of the basic purposes of CEQA is to inform decision-makers and the public about the potential, significant environmental effects of proposed activities (CEQA Guidelines Section 15002(a)(1)). A mitigated negative declaration is appropriate when the Lead Agency finds that the project will not have a significant effect on the environment after incorporating mitigation measures (CEQA Guidelines Sections 15070 to 15075). Reasons to support this finding shall be documented as substantial evidence in the initial study. Although the Lead Agency prepared a construction HRA analysis to analyze health risk impacts to nearby residents from construction activities, the Lead Agency should calculate cancer risk to residents during the operational phase by performing a mobile source HRA analysis<sup>22</sup> in the Final MND and compare cancer risk to South Coast AQMD's CEQA significance threshold of 10 in one million to determine the level of significance for the Proposed Project's health risks impact<sup>23</sup>. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating air pollutants should also be included.

## **7. Guidance Regarding Warehouses Sited Near Sensitive Receptors**

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 air pollution impacts, South Coast AQMD adopted the *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*<sup>24</sup> in 2005. Additional guidance is available in the CARB's *Air Quality and Land Use Handbook: A Community Health Perspective*, available at: <https://www.arb.ca.gov/ch/handbook.pdf>. For warehouses that accommodate more than 100 trucks per day, or more than 40 trucks with operating TRUs per day, a 1,000-foot separation between sensitive land uses (e.g., residential uses)<sup>25</sup> and the operating warehouse is recommended. Therefore, South Coast AQMD staff recommends that the Lead Agency review and consider these guidance documents when making local planning and land use decisions.

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<sup>20</sup> *Ibid.* Page 3.

<sup>21</sup> CARB. August 27, 1998. Resolution 98-35. Accessed at: <http://www.arb.ca.gov/regact/diesltac/diesltac.htm>.

<sup>22</sup> South Coast Air Quality Management District. *Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.

<sup>23</sup> 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.

<sup>24</sup> South Coast AQMD. May 2005. *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*. Accessed at: <http://www.aqmd.gov/home/library/documents-support-material/planning-guidance/guidance-document>.

<sup>25</sup> CARB. *Air Quality and Land Use Handbook: A Community Health Perspective*. Page 4. Accessed at: <https://www.arb.ca.gov/ch/handbook.pdf>.

## 8. Additional Recommended Mitigation Measures

CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse air quality impacts. To further reduce the Proposed Project's air quality impacts during construction and operation, and in addition to Mitigation Measure 5-1 South Coast AQMD staff has compiled a list of additional recommended mitigation measures as guidance that the Lead Agency should review for incorporation 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 website<sup>26</sup>.

### *Mitigation Measures for Construction Air Quality Impacts*

- a) Maintain equipment maintenance records for the construction portion of the Proposed Project. All construction equipment must be tuned and maintained in compliance with the manufacturer's recommended maintenance schedule and specifications. All maintenance records for each equipment and their construction contractor(s) should be made available for inspection and remain on-site for a period of at least two years from completion of construction.

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

- b) In the MND, the Lead Agency included information about available EV charging stations at a nearby shopping center to the Proposed Project. While it is important to inform employees working at the Proposed Project that EV charging stations are available at another location that is in close proximity to the Proposed Project, the Lead Agency should require EV charging stations and supporting infrastructure be provided at the Proposed Project as a design feature or mitigation measure. The California Green Building Standards Code (CALGreen) establishes minimum mandatory and voluntary standards for plan and design of sustainable site development and energy efficiency<sup>27</sup>, <sup>28</sup>. Under the CALGreen Code (23 CCR Part 11), mandatory standards include planning for inclusion of EV charging stations or designated spaces capable of supporting future charging stations<sup>28</sup>. Therefore South Coast AQMD staff recommends that the Lead Agency incorporate the following mitigation measure into the Final MND.

- *Require at least five percent of all vehicle parking spaces include electric vehicle (EV) charging stations, or at a minimum, require the Proposed Project to be constructed with the appropriate infrastructure to facilitate sufficient electric charging for trucks to plug-in. Electrical hookups should be provided at the onsite truck stop for truckers to plug in any onboard auxiliary equipment. The Lead Agency should also include analyses to evaluate and identify sufficient power available for zero emission trucks and supportive infrastructures (e.g., EV charging stations) in the Energy and Utilities and Service Systems Sections of the Final MND, where appropriate. To ensure implementation of EV technology to support the 4,127 passenger car equivalent trips that will visit the Proposed Project site daily, the Lead Agency shall install solar energy arrays on the building roofs and/or on the Proposed Project site to generate solar energy for the facility and/or EV charging stations.*

- c) The City shall require the use of zero-emissions (ZE) or near-zero emissions (NZE) on-road vehicles and off-road equipment during operation, such as trucks with natural gas engines that meet the CARB's adopted optional NOx emission standard of 0.02 grams per brake horsepower-

<sup>26</sup> South Coast AQMD. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.

<sup>27</sup> 2016 California Green Building Standards Code California Code of Regulations, Title 24, Part 11. California Building Standards Commission. January 1, 2017. Accessed at: <https://www.ladbs.org/docs/default-source/publications/codeamendments/2016-calgreen-complete.pdf>.

<sup>28</sup> MND. Page 51.



hour (g/bhp-hr). At a minimum, the City may require that operators commit to using 2010 model year 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 NO<sub>x</sub> emissions or newer, cleaner trucks and equipment. To monitor and ensure ZE, NZE, or 2010 model year or newer trucks are used at the Proposed Project, the City should require that operators maintain records of all trucks and equipment associated with the Proposed Project's operation, and make these records available to the City upon request. Alternatively, the City 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. To facilitate implementation of this mitigation measure, the City shall require operators of the proposed facilities to provide the vendor trucks information to incorporate energy efficiency improvement features through the Carl Moyer Program – including truck modernization, retrofits, and/or aerodynamic kits and low rolling resistance tires – to reduce fuel consumption.

- d) Limit the daily number of truck trips allowed at the Proposed Project to the level that was analyzed in the MND (e.g., 305 daily truck trips). If higher daily truck volumes are anticipated during operation than what were analyzed in the 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 truck activity levels (CEQA Guidelines Section 15162).
- e) 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.
- a) Establish area(s) within the Proposed Project site for repair needs and ensure that these designated areas are away from any sensitive receptors.

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

- b) Require the use of electric landscaping equipment, such as lawn mowers and leaf blowers.
- c) Maximize the planting of trees in landscaping and parking lots.
- d) Use light colored paving and roofing materials.
- e) Utilize only Energy Star heating, cooling, and lighting devices, and appliances.

**9. South Coast AQMD Rule 403(e), Permits, and Responsible Agency**

The Lead Agency included a discussion of general compliance with South Coast AQMD Rule 403 – Fugitive Dust in the MND<sup>29</sup>. Since the Proposed Project is a large operation of approximately 75 acres<sup>30</sup> (50-acre sites or more of disturbed surface area; or daily earth-moving operations of 3,850 cubic yards or more on three days in any year) in the South Coast Air Basin, the Lead Agency is required to comply with Rule 403(e) – Additional Requirements for Large Operations<sup>31</sup>. Additional requirements may include, but are not limited to, Large Operation Notification (Form 403 N), appropriate signage, additional dust control measures, and employment of a dust control supervisor that has successfully completed the Dust Control in the South Coast Air Basin training class<sup>32</sup>.

<sup>29</sup> MND. Page 12.

<sup>30</sup> *Ibid.* Page 4.

<sup>31</sup> South Coast AQMD. Rule 403. Last amended June 3, 2005. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf>.

<sup>32</sup> South Coast AQMD Compliance and Enforcement Staff's contact information for Rule 403(e) Large Operations is (909) 396-2608 or by e-mail at [dustcontrol@aqmd.gov](mailto:dustcontrol@aqmd.gov).

Therefore, South Coast AQMD recommends that the Lead Agency include a discussion to demonstrate specific compliance with South Coast AQMD Rule 403(e) in the Final MND. Compliance with South Coast Rule 403(e) will further reduce regional and localized emissions from particulate matters during construction.

The Proposed Project includes operation of manufacturing and warehouse uses. In the event that a permit from South Coast AQMD is required, South Coast AQMD should be identified as a Responsible Agency for the Proposed Project in the Final MND. Any assumptions used in the Air Quality Analysis in the Final MND will be used as the basis for permit conditions and limits for the Proposed Project. Generally, operation of portable engines and portable equipment units of 50 horsepower (hp) or greater that emit particulate matter require a permit from South Coast AQMD or registration with the Portable Equipment Registration Program (PERP) through CARB<sup>33</sup>. The Lead Agency should consult with South Coast AQMD's Engineering and Permitting staff to determine if the Proposed Project will involve uses of equipment requiring a South Coast AQMD permit or if registration under the PERP through CARB<sup>34</sup>. Should there be any questions on permits, please contact the South Coast AQMD's Engineering and Permitting staff at (909) 396-3385. For more general information on permits, please visit South Coast AQMD's webpage at: <http://www.aqmd.gov/home/permits>. For more information on the PERP Program, please contact CARB at (916) 324-5869 or visit CARB's webpage at: <https://ww2.arb.ca.gov/our-work/programs/portable-equipment-registration-program-perp>.

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<sup>33</sup> South Coast Air Quality Management District. *Portable Equipment Registration Program (PERP)*. Accessed at: <http://www.aqmd.gov/home/permits/equipment-registration/perp>.

<sup>34</sup> *Ibid.*