



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Mitigated Negative Declaration (MND) for the Proposed Horizon Business Park Project (Master Application 18211)

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 a 310,406-square-foot, non-refrigerated warehouse/distribution facility, and a parking lot with electric vehicle chargers and trailer stalls on 13.9 acres (Proposed Project). The Proposed Project is located on the northwest corner of Etiwanda Avenue and Cantu Galleano Ranch Road in the City of Jurupa Valley. Construction of the Proposed Project is anticipated to occur over approximately 10 months. Upon reviews of Figure 1: *Regional and Project Location and Sensitive Receptors* in the MND and aerial photographs, South Coast AQMD staff found that the Proposed Project is located immediately northwest of Jurupa Valley High School, and immediately north of existing residential uses¹. The Proposed Project is anticipated to be operational by 2020². Approximately 173 truck trips are anticipated per day once operational³.

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 and localized CEQA air quality significance thresholds. Based on the analysis, the Lead Agency found that the Proposed Project's construction and operational air quality impacts would be less than significant⁴. The Lead Agency performed a Health Risk Assessment (HRA) analysis and found that the maximum incremental cancer risks for residents and workers would be 0.29 in one million and 0.02 in one million, respectively, and both of which are below South Coast AQMD's CEQA significance threshold of 10 in one million for cancer risk⁵.

South Coast AQMD Staff's General Comments

On December 27, 2019, South Coast AQMD staff received a copy of the MND for the Proposed Project and associated appendices for review. However, the electronic versions of air dispersion modeling and emissions and cancer risk calculations technical files were not included. Subsequently, South Coast AQMD staff contacted the Lead Agency on January 2, 2020 to request the technical files, and followed

¹ MND. Page 10.

² *Appendix A: Air Quality, Green House Report*. Page 1.

³ *Appendix I: Traffic Impact Analysis*. Page 38. Table 5-A: Project Trip Generation.

⁴ MND. Pages 28-29.

⁵ *Ibid*. Page 36.

up on the request on January 8, 2020⁶. The Lead Agency provided the requested technical files to South Coast AQMD staff on January 14, 2020 that is one day before the public review and comment period on the MND closes on January 15, 2020. Given the limited review time of the technical files in electronic versions, South Coast AQMD staff's comments on the HRA analysis are based on reviews of the technical files in PDF versions. Please see the attachment for more information. The attachment also includes additional mitigation measures that the Lead Agency should review and incorporate in the Final MND to further reduce emissions.

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 supported by substantial evidence in the record 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 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
RVC191227-02
Control Number

⁶ South Coast AQMD. January 2, 2020 and January 8, 2020. E-mail correspondence between South Coast AQMD staff (Ms. Margaret Isied and the Lead Agency, City of Jurupa Valley (Ms. Rocio Lopez).

ATTACHMENT

Health Risk Assessment Analysis

1. In the MND, the Lead Agency calculated the cancer risk based on truck exhaust emission factors for year 2025. This is not appropriate and may have underestimated the cancer risk for three reasons. First, the Proposed Project is anticipated to be operational by year 2020⁷. Emission factors for year 2025 is not representative of emission factors for trucks that will begin to visit the Proposed Project when it becomes operational in year 2020. Second, peak daily emissions from on-road mobile sources generally occur early and gradually decrease over time. The overall emission rates of vehicles and trucks are generally higher in earlier years such as in year 2020 than in year 2025 as more stringent emission standards and cleaner technologies have not been fully implemented, and fleets have not fully turned over. Air quality is improving overtime with substantial emission reductions occurring in later years. Third, the California Air Resource Board (CARB) Truck and Bus regulation requires heavy-duty diesel vehicles that operate in California to have 2010 or newer model year engines to reduce particulate matter and NOx by January 1, 2023⁸. This state regulation will provide significant near-term and long-term reductions in NOx emissions from trucks and buses, at 98 tons per day for 2023⁹. Therefore, truck emissions in year 2025 are expected to be lower than those in year 2020. To conservatively analyze a worst impact scenario for the Proposed Project's health risk assessment, South Coast AQMD staff recommends that the Lead Agency re-calculate the Proposed Project's cancer risk based on truck emission factors from year 2020, or provide a justification for why the 2025 emissions factors are more conservative and appropriate to use in the Final MND.

Additional Recommended Mitigation Measures

2. CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate significant adverse impacts. The Proposed Project will be located in close proximity to Jurupa Valley High School and existing residences. To further reduce the Proposed Project's construction and operational emissions and their impacts on nearby sensitive receptors, South Coast AQMD staff recommends that the Lead Agency incorporate the following air quality mitigation measures 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 website¹⁰.

Mitigation Measures for Construction Air Quality Impacts

- a) Require the use of zero-emission (ZE) or near-zero emission (NZE) on-road haul trucks (e.g., material delivery trucks and soil import/export) such as heavy-duty trucks with natural gas engines that meet the CARB's adopted optional NOx emission standard at 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 year¹¹ or newer and cleaner engines that meet CARB's 2010 engine emission standards of 0.01 g/bhp-hr for particulate matter (PM) and the CARB's adopted optional NOx emission standard of 0.20 g/bhp-hr for NOx

⁷ Appendix A: Air Quality, Green House Report. Page 1.

⁸ CARB Truck and Bus Regulation. Accessed at: <https://ww2.arb.ca.gov/our-work/programs/truck-and-bus-regulation>.

⁹ California Air Resources Board. July 14, 2017. Trucks and Bus Regulation: On-Road Heavy-Duty Diesel Vehicles (In-Use) Regulation. Accessed at: <https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm>, and <https://www.arb.ca.gov/msprog/onrdiesel/documents/truckrulehealth.pdf>.

¹⁰ South Coast AQMD. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.

¹¹ 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>.

emissions. 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.

- b) 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 construction 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 construction meets the minimum 2010 model year engine emission standards. Alternatively, the Lead Agency should require periodic reporting and provision of written records by contractors and conduct regular inspections of the records to the maximum extent feasible and practicable.
- c) 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.
- d) Encourage construction contractors to apply for South Coast AQMD "SOON" funds. The "SOON" program provides funds to applicable fleets for the purchase of commercially-available low-emission heavy-duty engines to achieve near-term reduction of NOx emissions from in-use off-road diesel vehicles. More information on this program can be found at South Coast AQMD's website:<http://www.aqmd.gov/home/programs/business/business-detail?title=off-road-dieseleengines>.
- e) Restrict non-essential diesel engine idle time to not more than five consecutive minutes or another time-frame as allowed by the California Code of Regulations, Title 13 section 2485 - CARB's Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling. For any vehicle delivery that is expected to take longer than five minutes, each project applicant, project sponsor, or public agency will require the vehicle's operator to shut off the engine. Notify the vendors of these idling requirements at the time that the purchase order is issued and again when vehicles enter the gates of the facility. To further ensure that drivers and operators understand the idling requirement, include the idling requirement in the training materials for drivers, operators, and vendors, post signs at the entry of the construction site and throughout the Proposed Project site stating that idling longer than five minutes is not permitted.

Mitigation Measures for Operational Air Quality Impacts

- f) Require the use of ZE or NZE on-road haul trucks during operation, such as trucks with natural gas engines that meet the CARB's adopted optional NOx emission standard at 0.02 grams per brake horsepower-hour (g/bhp-hr). At a minimum, the Lead Agency may require that operators of heavy-duty trucks visiting the Proposed Project during operation 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 NOx emissions or newer, cleaner trucks. When requiring ZE or NZE on-road haul trucks, the Lead Agency should include analyses to evaluate and identify sufficient power and supportive infrastructure available for ZE/NZE trucks in the Energy and Utilities and Service Systems Sections of the Final MND, where appropriate.
- g) 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 construction 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 construction meets the minimum 2010 model year engine emission standards. Alternatively, the Lead Agency should require periodic reporting and provision of written records by contractors and conduct regular inspections of the records to the maximum extent feasible and practicable.

- h) Require trucks visiting the Proposed Project to use the Cantu Galleano Ranch Road as the designated truck route that was used to analyze the Proposed Project's air quality and HRA to quantify the greatest potential impact to nearby sensitive receptors in the Final MND. If the use of different truck routes is anticipated during operation than what was used to analyze the Proposed Project's air quality and HRA in the MND, the Lead Agency should commit to re-evaluating the impacts through a CEQA process prior to allowing trucks to travel along different routes (CEQA Guidelines Section 15162). If a re-evaluation is not needed, the Lead Agency should provide reasons for not including it supported by substantial evidence in the record. Approval from the Lead Agency should be obtained before different truck routes are used.
- i) Enforce primary truck access via the driveway on Cantu Galleano Ranch Road to ensure that trucks are as far away as possible from sensitive uses.
- j) 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 that truck traffic within the Proposed Project site is located away from the property line(s) closest to the sensitive receptors (e.g., residences and school).
- k) Establish area(s) within the Proposed Project site for repair needs and ensure that these designated areas are away from sensitive receptors (e.g., residences and school).