



# 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:

January 7, 2020

[Michael.Smith@CityofRC.us](mailto:Michael.Smith@CityofRC.us)

Mike Smith, Project Planner

City of Rancho Cucamonga, Planning Department

P.O. Box 807

Rancho Cucamonga, CA 91729

## **Mitigated Negative Declaration (MND) for the Proposed Industrial Project – Phelan (DRC2018-00912)**

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 three buildings totaling 510,847 square feet of non-refrigerated office/warehouse uses, including approximately 233,728 square feet for warehouse/distribution uses on 11.73 acres (Proposed Project). The Proposed Project is located on the northwest corner of Vineyard Avenue and 9<sup>th</sup> Street in the City of Rancho Cucamonga. Construction of the Proposed Project is anticipated to occur over eight months and will include 86 truck trips per day once operational<sup>1</sup>. Based on reviews of Figure 5: *Site Plan Schematics* in the MND and the Project Description, each building is anticipated to have three to five dock doors that will face 9<sup>th</sup> Street and Vineyard Avenue to the south and east of the Proposed Project, respectively<sup>2</sup>. Upon reviews of Figure 2: *Site Location* in the MND, South Coast AQMD staff found that existing residential uses are located immediately east of the Proposed Project<sup>3</sup>. The Proposed Project is anticipated to be operational by fall 2020<sup>4</sup>.

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

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 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>5</sup>. The Lead Agency found the site preparation phase during construction would result in localized air quality impacts from PM10 and PM2.5 emissions at 10.88 pounds per day (lbs/day) and 6.23 lbs/day<sup>6</sup>, respectively, which were slightly below South Coast AQMD's localized air quality CEQA significance thresholds for PM10 and PM2.5 at 11 lbs/day and 7 lbs/day, respectively. No air quality mitigation measures were included<sup>7</sup>. The Lead Agency also performed a Health Risk Assessment (HRA) analysis and found that the maximum incremental cancer risks for residents and workers would be 1.15 in one million and 0.19 in one million, respectively, both of which are below South Coast AQMD's CEQA significance threshold of 10 in one million for cancer risk<sup>8</sup>. Lastly, a Phase I Environmental Site

---

<sup>1</sup> MND. Page 36.

<sup>2</sup> *Ibid.* Page 14, 103.

<sup>3</sup> *Ibid.* Page 9.

<sup>4</sup> *Ibid.* Page 2.

<sup>5</sup> *Ibid.* Page 39.

<sup>6</sup> *Ibid.* Page 41.

<sup>7</sup> *Ibid.* Page 42.

<sup>8</sup> *Ibid.* Appendix C: Health Risk Assessment. Page 2

Assessment (ESA) was prepared for the Proposed Project<sup>9</sup>, which stated that “containers of hazardous substances/petroleum products were identified at the property”<sup>10</sup>.

South Coast AQMD Staff’s General Comments

To further reduce exposures of sensitive receptors to the Proposed Project’s construction and operational air quality impacts, South Coast AQMD staff recommends that the Lead Agency incorporate air quality mitigation measures in the Final MND. Please see the attachment for more information. The attachment also includes South Coast AQMD rules which the Lead Agency should discuss them 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 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  
SBC191205-03  
Control Number

---

<sup>9</sup> *Ibid.* Appendix J: Phase I Environmental Site Assessment (ESA).

<sup>10</sup> MND. Page 85.

**ATTACHMENT****Recommended Mitigation Measures for Construction Air Quality Impacts from Particulate Matter**

1. As stated above, the Proposed Project's localized construction PM10 and PM2.5 emissions during the site preparation phase would be 10.88 lbs/day and 6.39 lbs/day, respectively, which were slightly below South Coast AQMD air quality CEQA significance thresholds of 11 lbs/day and 7 lbs/day for PM10 and PM2.5 emissions, respectively. Since existing residential uses are located immediately east of the Proposed Project, to reduce their exposures to localized air quality impacts during construction, particularly from PM10 and PM2.5 emissions, South Coast AQMD staff recommends that the Lead Agency incorporate the following 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 website<sup>11</sup>.
  - a) Require construction equipment that meets U.S. EPA Tier 4 Final off-road emission standards. To ensure that Tier 4 Final construction equipment or better would be used during the Proposed Project's construction, South Coast AQMD staff recommends that the Lead Agency include this requirement in applicable bid documents, purchase orders, and contracts. Successful contractor(s) must demonstrate the ability to supply the compliant construction equipment for use prior to any ground disturbing and construction activities. A copy of each unit's certified tier specification or model year specification and California Air Resources Board (CARB) or South Coast AQMD operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment. Additionally, the Lead Agency should require periodic reporting and provision of written construction documents by construction contractor(s) to ensure compliance, and conduct regular inspections to the maximum extent feasible to ensure compliance. In the event that construction equipment cannot meet the Tier 4 Final engine certification, the Project representative or contractor must demonstrate through future study with written findings supported by substantial evidence that is approved by the Lead Agency before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, construction equipment with Tier 4 Interim or reduction in the number and/or horsepower rating of construction equipment and/or limiting the number of construction equipment operating at the same time.
  - b) 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.

**Recommended Mitigation Measures for Operational Air Quality Impacts**

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. Due to close proximity to existing residences, South Coast AQMD staff recommends that the Lead Agency incorporate the following operational air quality mitigation measures in the Final MND.

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

- a) Require the use of zero-emission (ZE) or near zero-emission (NZE) on-road haul trucks during operation, such as trucks with natural gas engines that meet the CARB's adopted optional NOx

---

<sup>11</sup> South Coast AQMD. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.

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.

- 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) Provide electric vehicle (EV) charging stations (see the discussion below regarding EV charging stations).
- d) 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>12</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, South Coast AQMD 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, South Coast AQMD staff recommends that the Lead Agency require at least five percent of all vehicle parking spaces (including for trucks) include EV charging stations<sup>13</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 be appropriately sized to allow for future expanded use
- e) Limit the daily number of truck trips allowed at the Proposed Project to the level that was analyzed in the MND (e.g., 86 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).
- f) Design the Proposed Project such that trucks visiting the Proposed Project utilize an entrance on Vineyard Avenue, North of 9<sup>th</sup> Street to avoid truck traffic traveling and passing through nearby existing residences.

---

<sup>12</sup> Southern California Association of Governments. Accessed at: <http://scagrtpsc.net/Pages/FINAL2016RTPSCS.aspx>.

<sup>13</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).

- g) 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).
- h) 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).

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

- i) Maximize the use of solar energy including solar panels. Installing the maximum possible number of 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.
- j) Require the use of electric landscaping equipment, such as lawn mowers and leaf blowers.
- k) Require use of electric or alternatively fueled sweepers with HEPA filters.
- l) Maximize the planting of trees in landscaping and parking lots.
- m) Use light colored paving and roofing materials.
- n) Utilize only Energy Star heating, cooling, and lighting devices, and appliances.

**South Coast AQMD Rules**

3. Disturbing and excavated soils that may contain hydrocarbons or toxic air contaminants are subject to the requirements of South Coast AQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil<sup>14</sup>, and Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants<sup>15</sup>. Since the containers of petroleum products and hazardous substances were identified at the Proposed Project, the Lead Agency should include a discussion on South Coast AQMD Rules 1166 and 1466 in the Air Quality Section of the Final MND.

---

<sup>14</sup> South Coast AQMD. Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>.

<sup>15</sup> South Coast AQMD. Rule 1466 – control of Particulate Emissions from Soils with Toxic Air Contaminants. Accessed at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf>.