



South Coast Air Quality Management District

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SENT VIA E-MAIL:

December 15, 2021

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**Draft Environmental Impact Report (EIR) for the Proposed
Bloomington Business Park Specific Plan Project (Proposed Project)
(SCH No.: 2020120545)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The County of San Bernardino is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. The following comments on the Draft EIR include recommended revisions to existing air quality project design features, new air quality project design features or mitigation measures, and a discussion of South Coast AQMD permits that the Lead Agency should include in the Final EIR.

Based on the Draft EIR, the Proposed Project consists of construction and operation of 3,235,836 square feet of light industrial, manufacturing, warehousing, and trailer parking uses on a 213-acre site that is located on the southeast corner of Santa Ana Avenue and Alder Avenue in the community of Bloomington. Development will be implemented in two planning areas. Planning Area A has two design options, resulting in either 2,113,640 square feet or 2,712,040 square feet of warehousing uses¹. Construction of Planning Area A is anticipated to begin in the fourth quarter of 2021 and will be completed by the fourth quarter of 2022². Planning Area B includes future development of industrial business park uses and has a proposed buildout year of 2040³.

The Proposed Project consisting of both planning areas as a whole will include 25 project design features (PDFs) for air quality⁴. These features include requirements such as heavy-duty haul trucks used during construction to be equipped with 2010 model year or newer engines, if feasible, and that all facility-owned and operated truck fleets accessing the site during operation are also equipped with 2010 model year or newer engines, among other requirements⁵. Once operational, the Proposed Project is anticipated to generate 8,555 trip-ends per day, 1,290 of which would be made by light-, medium- and heavy-duty trucks⁶. Although the warehouse tenant is unknown at the time of the release of the Draft EIR, the Proposed Project is not

¹ Draft EIR. Page 1-3.

² *Ibid.* Appendix C1 Air Quality Report.

³ *Ibid.* Page 3-16.

⁴ *Ibid.* Pages 5.3-57 to 59.

⁵ *Ibid.* Section 5.3 Air Quality. Pages 5.3-57 to 5.3-59.

⁶ *Ibid.* Appendix K1 Traffic Impact Assessment. Pages 67 to 69.

anticipated to include refrigerated logistics uses⁷. Based on the Draft EIR, existing sensitive receptors are 11 feet of the Proposed Project⁸.

Based on a review of the Draft EIR and supporting technical documents, South Coast AQMD staff has three main comments. A summary of these comments is provided as follows with additional details provided in the attachment.

1. Recommended Revisions to Existing Air Quality Project Design Features (PDFs): The Lead Agency requires the use of cleaner on- and off-road construction equipment and operational vehicles, including zero-emission light- and medium-duty trucks, if such trucks are widely available and economically feasible, and installation of electric charging infrastructure (PDF AQ-3, PDF AQ-4, PDF AQ-10, PDF AQ-12, and PDF AQ-13). Additional information on how widely available and economically feasible will be determined should be provided in the Final EIR. Given the close proximity of sensitive receptors, the Lead Agency should strengthen and expand the requirement of using zero-emissions or near-zero emission standards, or at a minimum 2010 model year on-road trucks during operation to all trucks accessing the Proposed Project, and not limit the requirement to those trucks that are owned or contracted by warehouse tenants and/or operators (PDF AQ-9).
2. Additional Recommended Air Quality PDFs or Mitigation Measures: In the Draft EIR, operation of the Proposed Project is found to have significant and unavoidable air quality impacts for VOC and NOx emissions. The Lead Agency should include additional PDFs or mitigation measures to identify clean construction and operational equipment and trucks that are already available and in-use, require their uses by the opening date for Planning Area A in 2022, develop considerations of potential cleaner technologies that will become feasible and available during the lifetime of the Proposed Project (buildout year 2040), develop a process for periodic technology assessment with performance standards, ensure future buildout at the Proposed Project does not exceed what was previously evaluated in the Draft EIR, and clearly mark truck routes with trailblazer signs to ensure truck travel avoids traversing by existing sensitive receptors.
3. Responsible Agency and South Coast AQMD Permits: If the Proposed Project will require the use of stationary equipment such as emergency generator(s) and fire pump(s), permit(s) from South Coast AQMD will be required. The Final EIR should include a discussion of stationary equipment that will require South Coast AQMD permits and identify South Coast AQMD as a CEQA Responsible Agency for the Proposed Project.

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), South Coast AQMD staff requests that the Lead Agency provide South Coast AQMD 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

⁷ *Ibid.* Chapter 3 Project Description. Page 3-15.

⁸ *Ibid.* Section 5.12 Noise. Pages 5.12-15 to 5.12-16.

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, informative, or useful to decision makers and to the public who are interested in the Proposed Project. Further, if the Lead Agency makes the finding that the recommended revisions to the existing PDFs and the recommended new air quality project design features or mitigation measures are not feasible, the Lead Agency should describe the specific reasons supported by substantial evidence for rejecting them in the Final EIR (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, Air Quality Specialist, at amullins@aqmd.gov, should you have any questions or wish to discuss the comments.

Sincerely,

Lijin Sun

Lijin Sun

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment
LS:AM
SBC210928-09
Control Number

ATTACHMENT**South Coast AQMD Staff's Summary of Air Quality Analysis and Health Risk Assessment in the Draft EIR**

In the Air Quality Analysis Section of the Draft EIR, the Lead Agency quantified the Proposed Project's maximum daily construction emissions. The Lead Agency considered three different construction options: Opening Year Option 1 and Opening Year Option 2 for Planning Area A, and Future Development/Specific Plan Buildout for Planning Area B. The Lead Agency compared the Proposed Project's construction emissions to South Coast AQMD's recommended regional air quality CEQA significance thresholds. Based on the analysis, the Lead Agency found that, for all three construction options evaluated, the Proposed Project's regional construction air quality impacts would be significant for VOC and NO_x emissions⁹. Mitigation Measures (MMs) AQ-1 and AQ-2 would require the use of low VOC architectural coatings with no more than 10g/L of VOC and require all off-road construction equipment 50 horsepower or greater to meet Tier 4 emission standards. With implementation of these mitigation measures, both regional VOC and NO_x emissions from construction activities from all three construction options would be reduced to less than significance levels¹⁰.

The Lead Agency also considered three different operational options: Opening Year Option 1, Opening Year Option 2, and Future Development/Specific Plan Buildout. Based on the analysis, the Lead Agency found that all three options would result in significant regional operational air quality impacts from VOC and NO_x emissions¹¹. MMs AQ-3 through AQ-7 require posting of idling restriction signage, contractual specifications that vendor trucks include energy efficiency improvement features through Carl Moyer, electric vehicle charging stations, installation of infrastructure to support electric forklifts and other interior equipment, and implementation of a transportation management association to coordinate carpooling. However, the Lead Agency found that air quality impacts from operating the Proposed Project under all three options would remain significant and unavoidable for VOC and NO_x emissions¹².

In the Draft EIR, the Lead Agency also quantified the Proposed Project's localized construction and operational emissions and compared them to the applicable South Coast AQMD's localized significance thresholds. Based on the analysis, the Lead Agency found that the Proposed Project's localized construction and operational air quality impacts would be less than significant¹³. Additionally, the Lead Agency calculated cancer risks from Proposed Project's operational activities under Opening Year Option 1, Opening Year Option 2, and Future Development/Specific Plan Buildout and found that the maximum cancer inhalation risk would be of 4.58 in one million, 5.78 in one million, and 3.11 in one million¹⁴, respectively, all of which would be below South Coast AQMD's CEQA significance threshold of 10 in one million for cancer risk¹⁵. Finally, the Draft EIR discussed South Coast AQMD Rules 2305 and 316¹⁶.

⁹ *Ibid.* Section 5.3 Air Quality. Page 5.3-33.

¹⁰ *Ibid.*

¹¹ *Ibid.* Page 5.3-34

¹² *Ibid.*

¹³ Draft EIR. Appendix C1 Air Quality Report. Pages 56 to 62.

¹⁴ *Ibid.* Pages 13 to 35.

¹⁵ South Coast AQMD's CEQA significance threshold of 10 in one million for cancer risk is based on the most current methodology recommended by the California Office of Environmental Health Hazard assessment.

South Coast AQMD staff's detailed comments on the Draft EIR are provided as follows.

1. Recommended Revisions to Existing Air Quality Project Design Features (PDFs)

a) *PDF AQ-3, PDF AQ-4, PDF AQ-10, PDF AQ-12, PDF AQ-13*

In the Draft EIR, the Lead Agency incorporated 25 PDFs related to air quality. Several PDFs (PDF AQ-3, PDF AQ-4, PDF AQ-10, PDF AQ-12, and PDF AQ-13) would require implementation of cleaner on- and off-road construction equipment and operational vehicles, including zero-emission light- and medium-duty trucks, and installation of electric charging infrastructure to further support electric vehicle (EV) usage onsite. However, these PDFs will only be implemented by the Lead Agency when they are “widely available and economically feasible” or “whenever feasible”¹⁷. South Coast AQMD staff recommends that the Lead Agency provide additional information on how “widely available and economically feasible” will be defined and determined in the Final EIR. The recommended information would establish a clear set of standards and criteria for assessing the technological, commercial, and economic availability and feasibility of using both cleaner on- and off-road construction equipment and operational vehicles and installing EV infrastructure, provide public transparency in the Lead Agency's decision-making regarding cleaner on- and off-road construction equipment, operational vehicles, and EV infrastructure, demonstrate a commitment by the Lead Agency to using cleaner on- and off-road construction equipment and operational vehicles and EV infrastructure, ensure implementation when they are available, strengthen the Proposed Project's air quality commitments, and facilitate the purpose and goal of CEQA on public disclosure.

b) *PDF AQ-9*

PDF AQ-9 requires that applicant/developer/tenant require that all facility-owned and operated fleet equipment with a gross vehicle weight rating greater than 14,000 pounds accessing the site meet or exceed 2010 model year emissions standards. Since the Proposed Project's operators, which are unknown at this time, may not have their own fleet equipment, and to further reduce the Proposed Project's significant and unavoidable NOx emissions during operation, South Coast AQMD staff recommends that the Lead Agency strengthen the PDF as follows to require all trucks accessing the Proposed Project are zero-emissions (ZE) or near-zero emissions (NZE) during operation, or at a minimum meet 2010 model year emission standards, not limited to those trucks that are owned or contracted by warehouse tenants and/or operators. This recommendation is needed to protect public health on nearby sensitive receptors that are located within 11 feet of the Proposed Project. It would also support and facilitate implementation of South Coast AQMD Rule 2305 – Warehouse Indirect Source Rule.

PDF AQ-9: The Project Applicant/Developer/Tenant shall require that all ~~facility-owned and operated fleet~~ equipment with a gross vehicle weight rating greater than 14,000 pound accessing the site be ZE or NZE operation such as heavy-duty trucks with natural gas engines that meet the CARB's adopted optional NOx emissions standard at 0.02 grams per brake horsepower-hour (g/bhp-hr). At a minimum, this equipment shall meet or exceed 2010

¹⁶ Draft EIR. Section 5.3 Air Quality. Page 5.3-9.

¹⁷ Draft EIR. Chapter 1 Executive Summary

model-year emissions equivalent engine standards as currently defined in California Code of Regulations Title 13, Division 3, Chapter 1, Article 4.5, Section 2025. Facility operators which own vehicles subject to Section 2025 shall maintain records on-site demonstrating compliance with this requirement and shall make records available for inspection by the local jurisdiction, air district, and state upon request.

2. Additional Recommended Air Quality PDFs or Mitigation Measures

In the Draft EIR, the Lead Agency found that the Proposed Project would result in significant and unavoidable air quality impacts from VOC and NO_x emissions during operation. CEQA requires that the Lead Agency consider mitigation measures to minimize significant adverse impacts (CEQA Guidelines Section 15126.4) and that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse impacts. South Coast AQMD staff recommends that the Lead Agency consider including the following operational air quality PDFs or mitigation measures in the Final EIR to further reduce the Proposed Project's significant and unavoidable air quality impacts during operation.

Technology is transforming the goods transport and movement sector at a rapid pace. ZE or NZE construction equipment, cargo handling equipment, and trucks are already commercially available and in-use. Therefore, the Lead Agency should use good-faith efforts to identify the available types of ZE or NZE construction and cargo handling equipment and trucks in the Final EIR and require their uses by the opening date for Planning Area A in 2022.

Clean construction and cargo handling equipment and trucks will become increasingly more feasible and commercially available as technology advances. If using ZE or NZE technologies is not feasible today, it could become feasible in a reasonable period of time during the Proposed Project's buildout schedule by 2040 (CEQA Guidelines Section 15364). Therefore, it is recommended that the Lead Agency include considerations of potential cleaner technologies that will become feasible and available during the lifetime of the Proposed Project and develop a process with performance standards to require and/or accelerate the deployment of the lowest emission technologies and the utilization of ZE or NZE construction and cargo handling equipment and heavy-duty trucks (CEQA Guidelines Section 15126.4(a)). The Lead Agency can and should develop the following performance standards or any other comparable standards in the Final EIR.

- Develop a minimum amount of ZE or NZE construction and cargo handling equipment and heavy-duty trucks that the Proposed Project must use each year during construction and operation to ensure adequate progress. Include this requirement in the Proposed Project's Construction Management Plan, business development agreement(s), and contracts with operator(s).
- Establish a contractor(s), tenant(s), or operator(s) selection policy that prefers contractor(s), tenant(s), or operator(s) who can supply and use ZE or NZE construction and cargo handling equipment and heavy-duty trucks during construction and operation. Include this policy in the Request for Proposal, procurement documents, and purchase order(s) for selecting contractor(s), tenant(s), or operator(s).
- Establish a policy to select and use vendors that use ZE or NZE heavy-duty trucks. Include this policy in the vendor contracts and business agreements.

- Establish a purchasing policy to purchase and receive materials from vendors that use ZE or NZE heavy-duty trucks to deliver materials. Include this policy in the procurement documents and purchase orders with vendors.
- Develop a target-focused and performance-based process and timeline to implement the use of ZE heavy-duty trucks during operation that is consistent with the timeline and requirement for warehouse activities under South Coast AQMD Rule 2305.
- Develop a project-specific process and criteria for periodically assessing progress in implementing the use of ZE heavy-duty trucks during operation.

Additional air quality PDFs or mitigation measures to further reduce the Proposed Project's operational air quality impacts from mobile sources and design considerations that the Lead Agency should consider in the Final EIR may include the followings:

- At this time, the Lead Agency has received development applications for three warehouses and one truck trailer parking lot. The Lead Agency analyzed up to 3,235,836 square feet of development and 8,555 truck trip ends daily. Since the Proposed Project will be fully built out by 2040 and additional developments are unknown at this time, the Lead Agency should limit the daily number of trucks allowed at the Proposed Project to levels that were analyzed in the Final EIR (8,555 daily truck trip ends). If higher daily truck volumes are anticipated to visit the site, especially as the Proposed Project is continued to be built out until 2040, the Lead Agency should commit to re-evaluating the increase in daily truck trips from the Proposed Project through CEQA prior to allowing a higher activity level than previously analyzed.
- In the Draft EIR, the Lead Agency explains that the Proposed Project's truck routes will be limited to south of Laurel Avenue, Locust Avenue, Maple Avenue, Jurupa Avenue, and Cedar Avenue¹⁸. These routes were used to model the Proposed Project's air quality concentrations during operation¹⁹. South Coast AQMD staff recommends that the Lead Agency clearly mark truck routes with trailblazer signs to ensure truck travel utilizes the routes analyzed in the Draft EIR and avoids traversing by the existing sensitive receptors (e.g. residents and schools).

3. Responsible Agency and South Coast AQMD Permits

If implementation of the Proposed Project requires the use of stationary equipment, including but is not limited to, emergency generator(s) and emergency fire pump(s), permits from South Coast AQMD are required. The Final EIR should include a discussion on stationary equipment that will require South Coast AQMD permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project. Any assumptions used in the Final EIR will be used as the basis for permit conditions and limits for the Proposed Project. The 2015 revised Office of Environmental Health Hazard Assessment (OEHHA) methodology is being used by South Coast AQMD for determining operational health risks for permitting applications and also for all CEQA projects where South Coast AQMD is the Lead Agency. Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions on permits. For more general information on permits, please visit South Coast AQMD's webpage at: <http://www.aqmd.gov/home/permits>.

¹⁸ Draft EIR. Section 5.9 Hazards and Hazardous Materials. Page 5.9-32.

¹⁹ Draft EIR. Appendix C2 Health Risk Assessment Report. Pages 17 to 19.