



South Coast
Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

FAXED: December 4, 2009

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Ms. Gina Gibson
City of Rialto
Development Services Department
150 South Palm Avenue
Rialto, CA 92376

**Review of the Recirculated Draft Environmental Impact Report (Draft EIR) for the
Proposed Rialto Commerce Center Development Project**

The South Coast Air Quality Management District (SCAQMD) 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 either a Revised Draft or Final Environmental Impact Report (Final EIR) as appropriate.

The SCAQMD staff appreciates that the lead agency allowed additional time in which to submit comments. Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. Further, staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,

A handwritten signature in black ink that reads "Susan Nakamura".

Susan Nakamura
Planning Manager
Planning, Rule Development & Area Sources

Attachment

SS:EE:DG

SBC091015-01
Control Number

Health Risk Assessment

1. On page 4.3-32 of the Draft EIR the lead agency discusses the potential implementation of rail service to the proposed project, however; the lead agency does not include emissions from rail service in the health risk assessment. Therefore, SCAQMD staff requests that the lead agency revise the health risk assessment to include the rail service emissions and determine the health risk impacts from the proposed project.

In the event that the lead agency's revised health risk assessment demonstrates significant adverse health risk impacts, the SCAQMD staff recommends that the lead agency consider adding the following mitigation measures to further reduce air quality impacts from the project, if feasible:

Diesel Particulate Matter (DPM)

- Require all locomotives to be equipped with anti-idling devices,
- Impose on-site idling restrictions, specifically; locomotives not equipped with anti-idling devices shall be manually limited to no more than 15 consecutive minutes of idling,
- Ensure that CARB diesel is used in all locomotive idling, and
- Require a complaint line to be established, and require prominent signage to be installed displaying an 800 phone number for complaints regarding smoke, noise and idling in excess of 15 minutes for locomotives at the project site.

Cumulative Air Quality Impacts

2. On page 3-5 of the Draft EIR, the lead agency acknowledges the development of an industrial project on land immediately north of the Rialto Commerce Center Project, which will be proposed by the same project proponent in the County of San Bernardino. The lead agency has not fully evaluated the cumulative air quality impacts of the planned industrial project adjacent to the Rialto Commerce Center. Therefore, SCAQMD staff would like to remind the lead agency that Section 15130 of the CEQA Guidelines requires the Draft EIR to provide reasonable analysis of the cumulative impacts of relevant projects and feasible options for mitigating or avoiding a project's contribution to any significant cumulative effects. SCAQMD staff requests that the lead agency revise the air quality impact analysis to identify specific air quality impacts and, if possible, quantify such impacts to address the incremental effects of the project when added to the foreseeable planned industrial site adjacent to the subject property. Also, if necessary, SCAQMD requests that the lead agency consider additional feasible mitigation measures to address any potentially significant cumulative air quality impacts.

Regional and Localized Operational Mitigation

3. Given the lead agency's operational emissions analysis demonstrates significant adverse impacts and in the event that the lead agency's revised operational emissions analysis requested in comment #3 may demonstrate new significant adverse impacts, the SCAQMD recommends that the lead agency consider adding the following mitigation measures to further reduce air quality impacts from the construction phase of the project, if feasible:

NO_x:

- Restrict operation to "clean" trucks, such as a 2007 or newer model year or 2010 compliant vehicle;
- Avoid siting new sensitive land uses within 1,000 feet of the warehouse/distribution center;
- Design the warehouse/distribution center such that entrances and exits are such that trucks are not traversing past neighbors or other sensitive receptors;
- Develop, adopt and enforce truck routes both in an out of city and in and out of facilities;
- Have truck routes clearly marked with trailblazer signs, so trucks will not enter residential areas;
- Identify or develop secure locations outside of residential neighborhoods where truckers that live in the community can park their truck, such as a Park & Ride;
- Re-route truck traffic by adding direct off-ramps for the truck or by restricting truck traffic on certain sensitive routes;
- Require or provide incentives for particulate traps that meet CARB certified level 3 requirements;
- Electrify service equipment at facility;
- Improve traffic flow by signal synchronization; and
- Conduct air quality monitoring at sensitive receptors.