



# South Coast Air Quality Management District

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## **Subsequent Draft Environmental Impact Report (SDEIR) for the Proposed SRG Chino South Industrial Park (SCH NO. 2007121019)**

The South Coast Air Quality Management District (AQMD) 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 CEQA document.

In the project description, the lead agency proposes to construct approximately 2,176,758 square feet of warehouse/distribution and general light industrial building space. This project will modify the 1,454,390 square feet of warehouse/distribution and general light industrial building space that was approved under a previous EIR certified January 20, 2009 (SCH No. 2007121019). The project site is approximately 125.09 acres in size and construction is expected to begin in 2013 with build-out occurring in 2015. The project will also involve approximately 775,000 cubic yards of cut and fill, which will be moved from the soil transfer site located immediately south. This soil movement is necessary to increase grade elevations on the project site in order to meet flood control requirements. The proposed project also includes an estimated 1,505 daily new diesel truck trips.

Due to the substantial number of trucks serving this project, regional air quality impacts are predicted to be significant during operations. AQMD staff believes that localized and health risk impacts during operations may also be significant as they were underestimated in the Draft EIR due to calculation errors. However there are few mitigation measures that have been put forward in the EIR to reduce emissions from trucking activity above and beyond existing regulations. AQMD staff therefore strongly recommends that the lead agency consider additional mitigation to reduce these emissions to the maximum extent feasible. Additional details are included in the attachment, including measures that have been adopted by other lead agencies for similar projects.

Ms. Andrea Gilbert,  
Project Planner

2

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Pursuant to Public Resources Code Section 21092.5, please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final Environmental Impact Report. The AQMD staff is available to work with the Lead Agency to address these issues and any other air quality questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,



Ian MacMillan  
Program Supervisor, Inter-Governmental Review  
Planning, Rule Development & Area Sources

Attachment  
IM:GM

SBC111115-08  
Control Number

### **Operational Mitigation Measures**

1. The lead agency has determined that air quality impacts from project operations will exceed recommended regional thresholds. AQMD staff believes that the project may have also inappropriately determined that localized and health risk impacts are less than significant due to calculation errors (see comments below). Because of the significant air quality impacts from the 1,500 daily trucks serving this project, the AQMD staff strongly recommends that the lead agency consider the following additional mitigation measures. Other lead agencies that have used these measures include the City of Banning<sup>1</sup>, Riverside County<sup>2</sup>, City of San Bernardino<sup>3</sup>, and the San Pedro Bay Ports<sup>4</sup>, among others.
  - All heavy duty trucks entering the property must meet or exceed EPA 2007 engine emission standards.
  - Beginning in 2015, all heavy duty trucks entering the property must meet or exceed 2010 engine emission standards.
  - The facility operator will maintain a log of all trucks entering the facility to ensure that on average, the daily truck fleet meets that emission standards listed in the EIR. This log should be available for inspection by city staff at any time.
  - The facility operator will ensure that site enforcement staff in charge of keeping the daily log and monitoring for excess idling will be trained/certified in diesel health effects and technologies [for example, by requiring attendance at CARB approved courses (such as the free, one-day Course #512)].
  - Limit the daily number of trucks allowed at each facility to levels analyzed in the Final EIR.
  - Require at least a portion of the fleet to utilize alternative fueled technologies.
  - Create a buffer zone of at least 300 meters (roughly 1,000 feet), which can be office space, employee parking, greenbelt, etc. between the warehouse and sensitive receptors.
  - Prohibit all vehicles from idling in excess of five minutes, both on- and off-site.
  - Have truck routes clearly marked with trailblazer signs, so trucks will not enter residential areas.
  - At a minimum, require tenants upon occupancy that do not already operate 2007 and newer trucks to apply in good faith for funding to replace/retrofit their trucks, such as Carl Moyer, VIP, Prop 1B, or other similar funds. Should funds be awarded, the tenant should also be required to accept and use them.
  - Require facility operator to become SmartWay Partner upon start of operations.
  - Require facility operator to incorporate incentives and requirements such that the maximum feasible number of truck trips (e.g., 90%) will be carried by SmartWay 1.0 or greater carriers within the shortest timeframe possible (e.g., three years).

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<sup>1</sup> Banning Business Park

<http://banning.ca.us/archives/30/July%202013,%202010%20City%20Council%20Agenda.pdf>

<sup>2</sup> Mira Loma Commerce Center

[http://www.rctlma.org/online/content/conditions\\_of\\_approval.aspx?PERMITNO=pp17788](http://www.rctlma.org/online/content/conditions_of_approval.aspx?PERMITNO=pp17788)

<sup>3</sup> Palm/Industrial Distribution Center

<http://www.ci.san-bernardino.ca.us/civica/filebank/blobload.asp?BlobID=11793>

<sup>4</sup> Clean Trucks Program <http://www.cleanairactionplan.org/cleantrucks/>

### **Traffic Rates Used in Localized Air Quality Analysis and HRA**

2. The peak hour traffic rates presented in the Draft EIR in the Traffic chapter and in the Air Quality chapter are not consistent with the daily rates. For example, in table 5.15-4, the total number of daily truck trips is 1,505, while the peak hour has only 54 truck trips per hour. The rate of 1,505 trucks/day is consistent with the cited trip generation rates of 3.57 trips per thousand square feet. However, if 1,505 trips/day is divided across a 24 hour day, the result is 63 trips/hour, higher than the reported 'peak hour'. The peak hour therefore appears to be underestimated by at least 15%, and probably significantly more. As traffic visiting this project site is unlikely to be spread evenly across a 24-hour day, the peak hour should have a disproportionately high value. As emissions are directly related to the number of vehicles visiting the site, these 'peak hour' values should be revisited and any subsequent analyses should be appropriately revised. The lead agency should also verify that this project could operate 24 hours per day.
3. The analysis of localized air quality impacts during operations inappropriately reduces the number of daily and annual offsite truck trips by converting actual trips based on Passenger Car Equivalents (PCE). For example, in the Air Quality Appendix, in a peak hour there are a reported 35 actual (not PCE) Heavy Heavy Duty Truck trips (HHDT) from the project. However after some adjustments made in the spreadsheets, this value is incorrectly reduced down to a total of 16 HHDT trips in a peak hour. The modeling analysis then assumes that there are only diesel emissions from 16 HHDT trips, significantly underestimating air quality impacts. The localized emissions analysis and health risk assessment from offsite truck traffic should therefore be revised to include all truck trips.
4. In the localized air quality analysis, the peak hourly trip rates are inappropriately calculated as peak daily trip rates. For example, Segment 1 (Euclid Avenue, south of Pine Avenue) is reported as having 51 trips/day, with an emission rate in grams per second derived from this trip rate. This value of 51 trips/day should actually be 51 trips/hour (and even higher based on comments above). The emissions are therefore underestimated by at least one order of magnitude from these sources. The same error was made for all offsite roadway segments modeled.
5. The allocation of truck trips to different roads in the air quality analysis and the health risk assessment do not appear to correlate to the traffic distribution determined in the Traffic chapter of the Draft EIR. Further clarification should be provided explaining the choice of traffic distribution in each analysis and why they are inconsistent.

### **Health Risk Assessment**

6. The lead agency inappropriately separated the health risk from construction and operations. With a reported cancer risk of 3.6 in one million from construction, and 6.4 in one million from operations, the total risk would be 10.0 in one million, greater than AQMD thresholds. However the lead agency determined that health risks are less than significant by arbitrarily separating construction and operation activities. As

residents in the area will not be able to separate these impacts, the total risk should be used to determine significance.

**Project Truck Routes**

7. The AQMD staff notes that sensitive receptors are located north and south of the proposed project site along various routes listed in the lead agency’s General Plan in Figure 4.13-9 as truck route, i.e., City Designated Truck Route State Truck Route, Large Truck Route and Adjacent Agency Truck Route. Although the SDEIR document contains a circulation diagram for the immediate surroundings, the SDEIR does not have a diagram explicitly showing the entire routes trucks would use to access the site from I-15 and SR-60. For example, in Exhibits 5.15-5 and 5.15-6, only approximately 45% of all trips eventually utilize SR-71. It appears that the project plans to daily send several hundred trucks east on arterials towards I-15 and north towards SR-60. If Euclid Avenue and Pine Avenue will be used as major corridors for trucks to access this site, then the potential air quality and health risk impacts on all residents located along these routes should be included in the CEQA analysis.

**Cumulative Impacts**

8. Although listed in the General Description of Environmental Setting on page 4-3, the AQMD staff is concerned that project cumulative impacts were not also addressed in the air quality analysis. Therefore, the AQMD staff recommends that the Cumulative Impacts Section should be revised in the Subsequent Final EIR and include the air quality impacts from projects listed on page 4-3 as well as any other foreseeable projects if those projects include vehicle traffic, especially diesel fueled trucks, that would operate near or pass by the proposed project site including where sensitive receptor areas are located in the project description.

<b>Name</b>	<b>Size (MSF)</b>	<b>Land Use Description</b>
Mountain Avenue Industrial Park	0.220	Heavy Warehouse
El Prado Road Industrial Building	0.394	Heavy Warehouse
Kimball venue Industrial Building	0.350	Heavy Warehouse

*MSF – Million Square Feet*

**Idling Times**

9. The HRA analysis assumes on page 5.3-40 that each truck will idle only 5 minutes per day onsite. Due to the high volume of trucks, and the very likely possibility of at least some queuing from 1,500 trucks entering and exiting the project site each day, AQMD staff recommends that the revised HRA include up to 15 minutes of total idling onsite per truck (5 minutes entering, 5 minutes exiting, and 5 minutes at the dock). In the SDEIR, the lead agency has proposed Mitigation Measure AQ-11. In MM AQ-11(c), the lead agency includes the provision, “All diesel delivery trucks servicing the project shall not idle for more than 5 minutes per truck per day.” The lead agency should include clarification in the Subsequent FEIR about how it would enforce this measure (other than signage) to ensure that this additional idling will not

occur. Otherwise, the lead agency should revise estimates of on-site idling and use up to 15 minutes per truck in the Subsequent Final EIR.

### **Construction Mitigation Measures**

10. Because the lead agency has determined that construction air quality impacts exceed the AQMD recommended thresholds of significance, and that the proposed project construction period will start in 2013 with potential build-out by 2015, the AQMD staff recommends the following revisions and additions to the mitigation measures for consideration in addition to the mitigation measures listed starting on page 5.3-25 in the Air Quality Section of the DSEIR, if applicable and feasible:

#### *Recommended Changes:*

##### MM AQ-2

- Project Start, to December 31, 2014: All offroad diesel-powered construction equipment greater than 50 hp shall meet Tier 3 offroad emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor achieve emissions reductions that are no less than what could be achieved by a Level 23 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
- Post-January 1, 2015: All offroad diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

##### MM AQ-4

- During project grading and building construction, the developer shall require all contractors to turn off all construction equipment and delivery vehicles when not in use or to limit idling onsite and offsite for not more than 5 minutes.

#### *Recommended Additions:*

- ❖ Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export) and if the lead agency determines that 2010 model year or newer diesel trucks cannot be obtained the lead agency shall use trucks that meet EPA 2007 model year NOx and PM emissions requirements,
- ❖ During project construction, all internal combustion engines/construction, equipment operating on the project site shall meet EPA-Certified Tier 2 emissions standards, or higher according to the following:
  - A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be available for inspection at the time of mobilization of each applicable unit of equipment.

- Encourage construction contractors to apply for AQMD “SOON” funds. Incentives could be provided for those construction contractors who apply for AQMD “SOON” funds. The “SOON” program provides funds to accelerate clean up of off-road diesel vehicles, such as heavy duty construction equipment. More information on this program can be found at the following website:  
<http://www.aqmd.gov/tao/Implementation/SOONProgram.htm> .
- Schedule construction activities to reduce overlapping phases with high emissions to the extent feasible.

For additional measures to reduce off-road construction equipment, refer to the mitigation measure tables located at the following website:

[www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html) .