



# South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

December 14, 2018

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## **Mitigated Negative Declaration (MND) for the Proposed 2600 Cajon Boulevard Project**

The South Coast Air Quality Management District (SCAQMD) 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.

### SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to develop a 278,047-square-foot warehouse on 13.47 acres (Proposed Project). Using trip generation factors included in the Institute of Transportation Engineers (ITE) Trip Generation Manual (9<sup>th</sup> Edition) for Land Use Code 150 – “Warehousing,” the Lead Agency estimated that “the Proposed Project would generate a daily trip rate of 594 cars, 67 two-axle trucks, 90 three-axle trucks, 237 four-plus-axle trucks”<sup>1</sup>. Based on a review of Figure 2, *Surrounding Land Uses*, in the MND and the Air Quality Section, SCAQMD staff found that “the nearest sensitive receptors in proximity to the project site are residential uses as close as 50 feet (15 meters) to the south and west”<sup>2</sup>. Construction of the Proposed Project is expected to take 15 months<sup>3</sup>.

### SCAQMD Staff's Summary of Air Quality Analysis

In the Air Quality Analysis Section, the Lead Agency quantified the Proposed Project's construction and operational emissions and compared those emissions to SCAQMD's recommended regional and localized air quality CEQA significance thresholds. The Lead Agency found that the Proposed Project's air quality impacts from construction and operational activities would be less than significant.

### SCAQMD Staff's General Comments

Based on a review of the Air Quality Analysis and Appendix A, *Air Quality and Greenhouse Gas Impact Analysis*, of the MND, SCAQMD staff found that the Lead Agency did not perform a mobile source health risk assessment (HRA) to determine the level of significance for the Proposed Project's long-term health impacts on nearby residents during operation. Additionally, the Lead Agency would require all construction equipment with greater than 50 horsepower (hp) to have Tier 2 engine with Level 1 diesel particulate filter<sup>4</sup> and included this requirement as a construction off-road equipment mitigation in the CalEEMod modeling file, not as a project design feature or mitigation measure in the main body of the MND. SCAQMD staff has comments on the mobile source HRA and Tier 2 construction equipment. Please see the attachment for more information. To further reduce the Proposed Project's long-term operational emissions, particularly from NO<sub>x</sub>, the attachment includes additional recommended mitigation measures that the Lead Agency should incorporate in the Final MND.

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<sup>1</sup> MND. Page 15.

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

<sup>3</sup> *Ibid.* Appendix A: *Air Quality and Greenhouse Gas Impact Analysis, CalEEMod Output*. Page 10 of 31.

<sup>4</sup> *Ibid.* Page 2 of 31.

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 the SCAQMD with written responses to all comments contained herein prior to the certification of the Final MND. When responding to issues raised in the comments, response 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 or useful to decision makers and to the public who are interested in the Proposed Project.

SCAQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact me at [lsun@aqmd.gov](mailto:lsun@aqmd.gov) if you have any questions.

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment

LS

SBC181205-04

Control Number

## ATTACHMENT

### **Mobile Source Health Risk Assessment (HRA)**

1. After reviewing the Air Quality Analysis in the main body of the MND and the technical Appendix A, it did not appear that the Lead Agency performed a mobile source HRA to determine the level of significance for the Proposed Project's long-term health impacts on nearby residents during operation. Since the Proposed Project involves operation of a warehouse that is capable of generating and attracting vehicular trips, especially heavy-duty, diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source HRA<sup>5</sup> in the Final MND and compare the results to SCAQMD's CEQA significance threshold of 10 in one million for cancer risks to disclose the potential health risks to residents from diesel particulate matter (DPM)-emitting diesel-fueled trucks that will visit the Proposed Project during operation. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

### **Tier 4 Construction Equipment or Level 3 Diesel Particulate Filters**

2. Based on a review of Appendix A, *Air Quality and Greenhouse Gas Impact Analysis, CalEEMod Output*, SCAQMD staff found that the Lead Agency would require all construction equipment with greater than 50 horsepower (hp) to have Tier 2 engine with Level 1 diesel particulate filter (DPF)<sup>6</sup>. While the Proposed Project's regional and localized construction air quality impacts were found to be less than significant, SCAQMD staff recommends that the Lead Agency use off-road diesel-powered construction equipment that meets or exceeds the California Air Resources Board (CARB) and U.S. EPA Tier 4 off-road emissions standards for equipment rated at 50 hp or greater during construction to further reduce criteria pollutants emissions. Such equipment will be outfitted with Best Available Control Technology (BACT) devices including a CARB certified Level 3 DPFs. Level 3 DPFs are capable of achieving at least 85 percent reduction in particulate matter emissions<sup>7</sup>. A list of CARB verified DPFs are available on the CARB website<sup>8</sup>. Additionally, SCAQMD staff recommends that the Lead Agency include this requirement in applicable bid documents, and that successful contractor(s) must demonstrate the ability to supply such equipment prior to demolition and ground disturbance activities. A copy of each unit's certified tier specification and CARB or SCAQMD operating permit (if applicable) should 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 documentation by contractors to ensure compliance, and conduct regular inspections to the maximum extent feasible to ensure compliance.

### **Enforceability**

3. To ensure that Tier 4 construction equipment or level 3 DPFs will be used during the construction phase of the Proposed Project, SCAQMD recommends that the Lead Agency include this requirement as a project design feature or a mitigation measure in the main body of the Final MND. In the event that the Lead Agency finds that Tier 4 construction equipment is not feasible pursuant to CEQA Guidelines Section 15364, the Lead Agency should, at a minimum, specify in the Final MND that using Tier 3 or newer construction equipment is a project requirement that contractor(s) must provide evidence to the City for review and approval prior to demolition and ground disturbing activities.

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<sup>5</sup> South Coast Air Quality Management District. *Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.

<sup>6</sup> MND. Appendix A: *Air Quality and Greenhouse Gas Impact Analysis, CalEEMod Output*. Page 2 of 31.

<sup>7</sup> California Air Resources Board. November 16-17, 2004. *Diesel Off-Road Equipment Measure – Workshop*. Page 17. Accessed at: [https://www.arb.ca.gov/msprog/ordiesel/presentations/nov16-04\\_workshop.pdf](https://www.arb.ca.gov/msprog/ordiesel/presentations/nov16-04_workshop.pdf).

<sup>8</sup> *Ibid*. Page 18.

### **Additional Recommended Mitigation Measures**

#### *SCAQMD's 2016 Air Quality Management Plan*

4. On March 3, 2017, the SCAQMD's Governing Board adopted the 2016 Air Quality Management Plan (2016 AQMP)<sup>9</sup>, which was later approved by the California Air Resources Board of Directors on March 23<sup>rd</sup>. Built upon the progress in implementing the 2007 and 2012 AQMPs, the 2016 AQMP provides a regional perspective on air quality and the challenges facing the South Coast Air Basin (Basin). The most significant air quality challenge in the Basin is to achieve an additional 45 percent reduction in nitrogen oxide (NO<sub>x</sub>) emissions in 2023 and an additional 55 percent NO<sub>x</sub> reduction beyond 2031 levels for ozone attainment.

Achieving NO<sub>x</sub> emission reductions in a timely manner is critical to attaining the National Ambient Air Quality Standard (NAAQS) for ozone before the 2023 and 2031 deadlines. SCAQMD is committed to attain the ozone NAAQS as expeditiously as practicable. As a warehouse project that is capable of generating and attracting vehicular trips, especially heavy-duty diesel-fueled vehicles, the Proposed Project plays an important role in contributing to the Basin's NO<sub>x</sub> emissions. Therefore, SCAQMD staff recommends that the Lead Agency incorporate the following mitigation measures in the Final MND to further reduce NO<sub>x</sub> emissions during operation.

#### *Additional Recommended Mitigation Measures for Operational Air Quality Impacts from Mobile Sources*

- Require zero-emissions or near-zero emission trucks, if and when feasible. Consider measures such as incentives, phase-in schedules for clean trucks, etc. At a minimum, require that construction vendors, contractors, and/or haul truck operators commit to using 2010 model year<sup>10</sup> and newer trucks (e.g., material delivery trucks and soil import/export). Require the use of 2010 and newer haul trucks (e.g., material delivery trucks and soil import/export).
- Have truck routes clearly marked with trailblazer signs so that trucks will not enter residential areas.
- Limit the daily number of trucks allowed at the Proposed Project to levels analyzed in the MND (e.g., 67 two-axle trucks, 90 three-axle trucks, 237 four-plus-axle trucks). If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the Proposed Project through CEQA prior to allowing this land use or higher activity level.
- Provide electric vehicle (EV) charging stations. SCAQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency.
- Trucks that can operate at least partially on electricity have the ability to substantially reduce NO<sub>x</sub> emissions during operation. 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>11</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

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<sup>9</sup> South Coast Air Quality Management District. March 3, 2017. *2016 Air Quality Management Plan*. Accessed at: <http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan>.

<sup>10</sup> Based on a review of the California Air Resources Board's diesel truck regulations, 2010 model year diesel haul trucks should have already been available and can be obtained in a successful manner for the project construction California Air Resources Board. March 2016. Available at: <http://www.truckload.org/tca/files/ccLibraryFiles/Filename/000000003422/California-Clean-Truck-and-Trailer-Update.pdf> (See slide #23).

<sup>11</sup> Southern California Association of Governments. Accessed at: <http://scagrtpsc.net/Pages/FINAL2016RTPSCS.aspx>.

compared to retrofitting an existing building. Therefore, SCAQMD staff recommends the Lead Agency require the Proposed Project 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, SCAQMD staff recommends that the Lead Agency require at least 5% of all vehicle parking spaces (including for trucks) include EV charging stations<sup>12</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 appropriately sized to allow for future expanded use.

- Design the warehouse building such that entrances and exits are such that trucks are not traversing past neighbors or other sensitive receptors.
- Design the warehouse building 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.
- Design the warehouse building to ensure that truck traffic within the Proposed Project site is located away from the property line(s) closest to its residential or sensitive receptor neighbors.
- Restrict overnight parking in residential areas.
- Establish overnight parking within the industrial building where trucks can rest overnight.
- Establish area(s) within the Proposed Project site for repair needs.
- Develop, adopt and enforce truck routes both in and out of city, and in and out of facilities.
- Create a buffer zone of at least 300 meters (roughly 1,000 feet), which can be office space, employee parking, greenbelt, etc. between the Proposed Project and sensitive receptors that are located to the south and west of the Proposed Project.

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

- Maximize use of solar energy including solar panels; installing the maximum possible number of solar energy arrays on the building roofs and/or on the Project site to generate solar energy for the facility.
- Maximize the planting of trees in landscaping and parking lots.
- Use light colored paving and roofing materials.
- Require the use of electric landscaping equipment, such as lawn mowers and leaf blowers.
- Require use of electric or alternatively fueled sweepers with HEPA filters.
- Use of water-based or low VOC cleaning products that go beyond the requirements under SCAQMD Rule 1113.

Several other resources are available to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project, including, but not limited to, the followings.

- Chapter 11 of SCAQMD's CEQA Air Quality Handbook
- SCAQMD's Mitigation Monitoring and Reporting Plan (MMRP) for the 2016 Air Quality Management Plan (2016 AQMP) available here (starting on page 86):  
<http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf>
- CAPCOA's *Quantifying Greenhouse Gas Mitigation Measures* available here:  
<http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

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<sup>12</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).