



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 2, 2020

Aron.Liang@lus.sbcounty.gov

Aron Liang, Senior Planner

County of San Bernardino

Land Use Services Department, Planning Department

385 North Arrowhead Avenue

San Bernardino, CA 92415

Draft Environmental Impact Report (Draft EIR) for the Proposed Slover/Cactus Avenue Warehouse Facility Project (SCH No.: 2019039033)

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 EIR.

South Coast AQMD Staff's Summary of Project Description

The Lead Agency proposes to demolish 7,076 square feet of existing residential uses and construct a 257,855-square-foot, non-refrigerated warehouse on 13.3 acres (Proposed Project). The Proposed Project is located on the southwest corner of Slover Avenue and Cactus Avenue in the community of Bloomington within the County of San Bernardino. The Proposed Project would be constructed over an 11-month period¹. During construction, the Proposed Project would result in a balanced cut and fill of 38,606 cubic yards². The Proposed Project will become operational as early as 2020³. During operation, the Proposed Project would generate 449 total vehicle trips, 90 of which would be diesel truck-trip ends⁴. Sensitive receptors (e.g., residents) are within 80 feet of the Proposed Project⁵.

South Coast AQMD Staff's Summary of the Air Quality Analysis

In the Air Quality Analysis, the Lead Agency quantified the Proposed Project's construction emissions and compared those emissions to South Coast AQMD's recommended regional and localized air quality CEQA significance thresholds for construction. Based on the analyses, the Lead Agency found that the localized construction air quality impacts would be significant for PM_{2.5} at 6.70 pounds per day (lbs/day) when compared to South Coast AQMD's localized CEQA air quality significance threshold at 6 lbs/day⁶ for PM_{2.5} from construction in Source Receptor Area 24 – Perris Valley. With implementation of Mitigation Measures (MMs) MM 4.2-1 and 4.2-2⁷, which require the use of construction equipment greater than 150 horsepower (hp) to meet Tier 3 off-road emissions standards during the site preparation phase and compliance with South Coast AQMD 403 – Fugitive Dust⁸, the Lead Agency found localized PM_{2.5} emissions would be reduced to slightly below the localized significance threshold at 5.88 lbs/day⁹. Additionally, to minimize the Proposed Project's emissions from VOCs during construction, the Lead

¹ Draft EIR. Section 4.2: Air Quality. Page 4.2-17.

² *Ibid.* Section 3.0: Project Description. Page 3-13.

³ *Ibid.* Section 4.2: Air Quality. Page 4.2-17.

⁴ *Ibid.* Section 4.12: Transportation. Page 4.12-12.

⁵ Draft EIR. Appendix B1: *Air Quality Impact Analysis*. Page 42.

⁶ *Ibid.* Page 46.

⁷ Draft EIR. Section 4.2: Air Quality. Pages 4.2-31 through 4.2-32.

⁸ South Coast AQMD Rule 403- Fugitive Dust. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf>.

⁹ Draft EIR. Appendix B1: *Air Quality Impact Analysis*. Page 47.

Agency has committed to implementing MM 4.2-3, which requires compliance with South Coast AQMD Rule 1113 – Architectural Coatings¹⁰.

The Lead Agency quantified the Proposed Project's operational emissions and compared those emissions to South Coast AQMD's recommended regional and localized air quality CEQA significance thresholds for operation. Based on the analyses, the Lead Agency found that the Proposed Project would not result in significant air quality impacts during operation¹¹. However, to minimize the Proposed Project's long-term NOx emissions, the Lead Agency has committed to implementing MMs 4.2-4 and 4.2-5, which require the implementation of anti-idling signage and use of outdoor cargo handling equipment (CHE) that have electric or non-combustion engines¹².

The Lead Agency also prepared a mobile source Health Risk Assessment (HRA) analysis and found that operation of the Proposed Project would result in a cancer risk of 1.29 in one million at the maximum impacted sensitive receptor¹³, which would not exceed South Coast AQMD's CEQA significance threshold of 10 in one million for cancer risk¹⁴.

South Coast AQMD Staff's General Comments

Upon review of the Air Quality Analysis, it was unclear to South Coast AQMD staff if the Lead Agency quantified and included emissions from both indoor and outdoor CHE that would be used at the Proposed Project to determine the level of significance for the Proposed Project's operational air quality impacts. South Coast AQMD staff also has comments on the cancer risk calculation for the HRA analysis. To further reduce the Proposed Project's localized PM2.5 emissions during construction, South Coast AQMD staff recommends the Lead Agency revise existing MM 4.2-1 in the Final EIR. Please see the attachment for more information. The attachment also includes a list of additional recommended mitigation measures to further reduce the Proposed Project's operational air quality impacts that should be reviewed for incorporation in the Final EIR.

Conclusion

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 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 MM 4.2-1 and the additional 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).

¹⁰ South Coast AQMD Rule 1113 – Architectural Coatings. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf>.

¹¹ Draft EIR. Appendix B1: *Air Quality Impact Analysis*. Page 40.

¹² Draft EIR. Section 4.2: Air Quality. Pages 4.2-32 through 4.2-33.

¹³ Draft EIR. Appendix B2: *Mobile Source Health Risk Assessment*. Page 1.

¹⁴ South Coast AQMD has developed the CEQA significance threshold of 10 in one million for cancer risk. When South Coast AQMD acts as the Lead Agency, South Coast AQMD staff conducts a HRA, compares the maximum cancer risk to the threshold of 10 in one million to determine the level of significance for health risk impacts, and identifies mitigation measures if the risk is found to be significant.

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, Assistant Air Quality Specialist, at amullins@aqmd.gov or (909) 396-2402, should you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment

LS:AM

SBC191121-05

Control Number

ATTACHMENT

Air Quality Analysis – Cargo Handling Equipment (CHE)

1. The Proposed Project includes operation of a warehouse, which will require the use of CHE (e.g., yard trucks, hostlers, yard goats, pallet jacks, forklifts) during operations to move goods. In the Air Quality Analysis, the Lead Agency discussed the use of CHE¹⁵ but did not quantify emissions from the operation of indoor and/or outdoor CHE. If it is reasonably foreseeable that operations of the Proposed Project will require the use of CHE, the Lead Agency should quantify and disclose emissions from the use of indoor and/or outdoor CHE in the Final EIR. If there is substantial evidence to support that a quantitative analysis of emissions from the use of CHE is not warranted, the Lead Agency should disclose it supported by factual information as substantial evidence in the Final EIR.

Mobile Source Health Risk Assessment (HRA) Analysis

2. The Proposed Project includes operation a warehouse, which is expected to generate 90 truck trip ends during operation¹⁶. Surrounding sensitive receptors to the Proposed Project would be exposed to diesel particulate matter (DPM) from the transportation and idling of trucks visiting the Proposed Project. DPM is a toxic air contaminant (TAC) and a carcinogen. Therefore, the Lead Agency performed a quantitative mobile source HRA analysis to determine if the Proposed Project would result in a significant incremental increase in potential cancer risks to surrounding sensitive receptors (i.e., residential units within 80 feet of the Proposed Project)¹⁷. The Lead Agency found that the Proposed Project would result in a cancer risk of 1.29 in one million at the maximally exposed individual receptor¹⁸, which would not exceed South Coast AQMD's CEQA significance threshold of 10 in one million for cancer risk¹⁹. South Coast AQMD staff has comments on the cancer risk calculations for the HRA analysis as follows.

a) Daily Breathing Rates

The Lead Agency used the daily breathing rates for the 2 to 16 years age bin and 16 to 30 years age bin representative of 80th percentile daily breathing rates. South Coast AQMD staff recommends that when there are different daily breathing rates for the same age bin, the most conservative daily breathing rates, such as the 95th percentile daily breathing rates, should be used. Therefore, South Coast AQMD staff recommends that the Lead Agency revise the HRA to re-calculate cancer risk based on the 95th percentile daily breathing rates in the Final EIR.

Recommended Revisions to Existing Air Quality Mitigation Measure (MM) 4.2-1

3. CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse air quality impacts. While the implementation of MM 4.2-1, which requires the use of Tier 3 construction equipment with engines greater than 150 horsepower during site preparation, would reduce localized PM2.5 construction emissions from 6.70 lbs/day to 5.88 lbs/day²⁰, localized PM2.5 emissions would be slightly below South Coast AQMD's CEQA localized air quality significance threshold at 6 lbs/day²¹ for PM2.5 from construction in Source Receptor Area 24 – Perris Valley. To further reduce the Proposed Project's localized air quality impacts from PM2.5 emissions during construction on nearby sensitive

¹⁵ Draft EIR. Section 3.0: Project Description. Page 3-18.

¹⁶ Draft EIR. Section 4.12: Transportation. Page 4.12-12.

¹⁷ Draft EIR. Appendix B1: *Air Quality Impact Analysis*. Page 42.

¹⁸ Draft EIR. Appendix B2: *Mobile Source Health Risk Assessment*. Page 1.

¹⁹ South Coast AQMD has developed the CEQA significance threshold of 10 in one million for cancer risk. When South Coast AQMD acts as the Lead Agency, South Coast AQMD staff conducts a HRA, compares the maximum cancer risk to the threshold of 10 in one million to determine the level of significance for health risk impacts, and identifies mitigation measures if the risk is found to be significant.

²⁰ Draft EIR. Appendix B1: *Air Quality Impact Analysis*. Pages 46 through 47.

²¹ *Ibid*. Page 46.

receptors, South Coast AQMD staff recommends that the Lead Agency make the following revisions to MM 4.2-1 in the Final EIR.

MM 4.2-1:

~~Prior to grading permit issuance, the County of San Bernardino shall require and verify that a note is included on all grading construction plans that requires all construction equipment used on the Project site during the site preparation phase construction and that exceeds 450 horsepower to be California Air Resources Board (CARB) Tier ~~3~~ equivalent 4 Final or better and shall ensure that all construction equipment is tuned and maintained in accordance with the manufacturer's specifications. Such equipment will be outfitted with Best Available Control Technology (BACT) devices including a CARB-certified Level 3 Diesel Particulate Filter (DPFs). Level 3 DPFs are capable of achieving at least 85 percent reduction in particulate matter emissions²². A list of CARB verified DPFs are available on the CARB website²³. ~~The Project contractor(s) shall be required to comply with this note and allow inspection of the construction site by County of San Bernardino staff or its designee to confirm compliance.~~~~

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 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. The Project contractor(s) shall be required to comply with this note and allow inspection of the construction site by County of San Bernardino staff or its designee to confirm 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 emission standards, reduction in the number and/or horsepower rating of construction equipment, limiting the number of daily construction haul truck trips to and from the Proposed Project, and/or limiting construction phases occurring simultaneously.

Additional Recommended Mitigation Measures for Operational Air Quality Impacts

4. South Coast AQMD staff has compiled a list of recommended mitigation measures as suggested resources and guidance to the Lead Agency to assist in the identification of feasible mitigation measures for incorporation in the Final EIR to further reduce the Proposed Project's operational air quality impacts. For more information on potential mitigation measures as guidance to the Lead Agency, please visit South Coast AQMD's CEQA Air Quality Handbook website²⁴.

Mitigation Measures for Operational Air Quality Impacts from Mobile Sources

²² CARB. 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.

²³ *Ibid*. Page 18.

²⁴ South Coast Air Quality Management District. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.

- a) Require the use of zero-emission (ZE) or near-zero emission (NZE) on-road trucks during operation, such as trucks with natural gas engines that meet the CARB's adopted optional NOx 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) 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 (e.g., residences within 80 feet), where feasible.
- d) Design the Proposed Project such that entrances and exits are such that trucks are not traversing past residences, and other sensitive receptors near the Proposed Project.
- e) 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), which are within 80 feet of the Proposed Project.
- f) Limit the daily number of truck trips allowed at the Proposed Project to the level that was analyzed in the Final EIR (e.g., 90 daily truck trips). If higher daily truck volumes are anticipated during operation than what were analyzed in the adopted Final EIR, 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).
- g) Require trucks to use the truck routes that are used to analyze the air quality and HRA impacts in the Final EIR²⁵.
- h) Have truck routes clearly marked with trailblazer signs, so that trucks will not enter residential areas that are adjacent to portions of the designated truck routes analyzed in the Final EIR (e.g., Orange Street, Cedar Avenue, Larch Avenue, etc.²⁶).

²⁵ Based on a review of Exhibit 2-B: Modeled Receptors in Appendix B2: *Mobile Source Health Risk Assessment*, Page 18, South Coast AQMD staff found that the truck route used to analyze air quality and HRA impacts in the Draft EIR include: Cedar Avenue at I-10 Westbound & Eastbound Ramps, Cedar Avenue to Slover Avenue, Slover Avenue to Driveway 1 and 2 (Future), Cactus Avenue at Slover Avenue, Cactus Avenue to Driveway 3 and 4 (Future) and Slover Avenue to Riverside Avenue.

- i) Restrict overnight truck parking in residential areas. Establish parking within the Proposed Project where trucks can rest overnight.
- j) Establish area(s) within the Proposed Project site for repair needs and ensure that these designated areas are away from any sensitive land uses.

Mitigation Measures for Operational Air Quality Impacts from Area Sources

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

²⁶ Based on a review of Exhibit 2-B: Modeled Receptors in Appendix B2: *Mobile Source Health Risk Assessment*, Page 18, South Coast AQMD staff found that the sensitive receptors are adjacent to portions of the designated truck routes, including: Orange Street, Slover Avenue, Cedar Avenue, Spruce Avenue, Cactus Avenue, Otilia Street.