



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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**Ontario International Airport Authority Proposed
South Airport Cargo Center Project and Related Improvements (Proposed Project)
and the February 25, 2024 Draft Air Quality Impact Analysis Protocol for NEPA and
General Conformity Evaluations**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The Federal Aviation Administration (FAA) is the National Environmental Policy Act (NEPA) Lead Agency for the Proposed Project. Our review focused on the Draft Air Quality Impact Analysis Protocol for NEPA, and this letter contains comments and recommendations on the analysis of potential air quality impacts from the Proposed Project that should be included in the future NEPA document. Please send a copy of the NEPA document upon its completion and public release directly to South Coast AQMD. **In addition, please send all appendices and technical documents related to the air quality, health risk, and greenhouse gas analyses (electronic versions of all emission calculation spreadsheets, air quality modeling, and health risk assessment input and output files, not PDF files). Any delays in providing all supporting documentation for our review will require additional review time beyond the end of the comment period.**

Also, please note that comments relative to the general conformity evaluation will be transmitted in a separate letter.

NEPA/CEQA Air Quality Analysis

Staff recommends that the NEPA Lead Agency comply with the United States Environmental Protection Agency (U.S. EPA) to analyze and compare the air quality emissions to the De Minimis Levels¹ and to provide the General Conformity for NAAQS nonattainment and maintenance areas.² The General Conformity is intended to prevent the air quality impacts of the Proposed Project from causing or contributing to new violations of the air quality standards, exacerbating existing violations, or interfering with the purpose of the applicable implementation plans. As mentioned above, detailed comments regarding the general conformity evaluation will be transmitted in a separate letter.

¹ U.S. EPA. De Minimis Tables. Access at: <https://www.epa.gov/general-conformity/de-minimis-tables>

² South Coast AQMD General Conformity. Access at: <http://www.aqmd.gov/home/rules-compliance/ceqa/general-conformity>

South Coast AQMD has previously reviewed and provided a comment letter on April 25, 2023, regarding the Proposed Project during the CEQA process. The comment letter can be accessed via the South Coast AQMD CEQA webpage at <https://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2023/april-2023/SBC230322-02.pdf>.

Mitigation Measures

In the event that the Proposed Project's construction is anticipated to last over a long period, Tier 4 technology may not be the cleanest technology when construction occurs in the later years. According to the CARB Strategies for Reducing Emissions from Off-Road Construction Equipment, the implementation of off-road Tier 5 starting in 2027 or 2028 and the Governor's Executive Order in September 2020 requires CARB to develop and propose a full transition to Zero Emissions (ZE) by 2035.³ Considering the scope of the project, it is crucial to ensure that the levels of construction emissions, specifically NOx and PM10, remain less than the significance thresholds during the construction period for each proposed individual project. Moving towards achieving this goal, when feasible, involves opting for electric emission-free engines instead of diesel-fueled engines for construction equipment. This proactive choice not only aligns with environmental concerns but also demonstrates a commitment to minimizing the Proposed Project's environmental footprint. The abatement of NOx can also be pursued by enforcing greener construction activities, such as limiting the usage of older, dirtier engines in favor of adopting the latest available technologies or even incorporating exhaust retrofits, such as cutting-edge exhaust after-treatment techniques.

To further reduce the Proposed Project's air quality impacts, South Coast AQMD recommends incorporating the following mitigation measures and project design considerations into the NEPA document.

Mitigation Measures for Operational Air Quality Impacts from Mobile Sources

1. Require zero emission (ZE) or near-zero emission (NZE) on-road haul trucks, 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), if and when feasible.

Note: Given the state's clean truck rules and regulations aiming to accelerate the utilization and market penetration of ZE and NZE trucks, such as the Advanced Clean Trucks Rule⁴ and the Heavy-duty Low NOx Omnibus Regulation,⁵ ZE and NZE trucks will become increasingly more available to use.

2. Require a phase-in schedule to incentivize the use of cleaner operating trucks to reduce any significant adverse air quality impacts.

³ CARB. Going Zero. Available at: <https://ww2.arb.ca.gov/going-zero>

⁴ CARB. June 25, 2020. Advanced Clean Trucks Rule. Accessed at: <https://ww2.arb.ca.gov/our-work/programs/advanced-cleantrucks>

⁵ CARB has recently passed a variety of new regulations that require new, cleaner heavy-duty truck technology to be sold and used in state. For example, on August 27, 2020, CARB approved the Heavy-Duty Low NOx Omnibus Regulation, which will require all trucks to meet the adopted emission standard of 0.05 g/hp-hr starting with engine model year 2024. Accessed at: <https://ww2.arb.ca.gov/rulemaking/2020/hdomnibuslownox>

Note: South Coast AQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency.

3. At a minimum, require the use of a 2010 model year⁶ that meets CARB's 2010 engine emissions standards at 0.01 g/bhp-hr of particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks. All heavy-duty haul trucks should meet CARB's lowest optional low-NOx standard starting in 2022. Where appropriate, include environmental analyses to evaluate and identify sufficient electricity and supportive infrastructures in the Energy and Utilities and Service Systems Sections in the NEPA document. Include the requirements in applicable bid documents, purchase orders, and contracts. Operators shall maintain records of all trucks associated with project construction to document that each truck used meets these emission standards and make the records available for inspection. Regular inspections should be conducted by the Lead Agency to the maximum extent feasible to ensure compliance.
4. Limit the daily number of trucks allowed at the Proposed Project to levels analyzed in the NEPA document. If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the Proposed Project through NEPA prior to allowing this higher activity level.
5. Provide electric vehicle (EV) charging stations or, at a minimum, provide electrical infrastructure, and electrical panels should be appropriately sized. Electrical hookups should be provided for truckers to plug in any onboard auxiliary equipment.

Mitigation Measures for Operational Air Quality Impacts from Other Area Sources

1. Maximize the use of solar energy by installing solar energy arrays.
2. Use light-colored paving and roofing materials.
3. Utilize only Energy Star heating, cooling, and lighting devices and appliances.

Design Considerations for Reducing Air Quality and Health Risk Impacts

1. Clearly mark truck routes with trailblazer signs so that trucks will not travel next to or near sensitive land uses (e.g., residences, schools, daycare centers, etc.).
2. Design the Proposed Project such that truck entrances and exits are not facing sensitive receptors and trucks will not travel past sensitive land uses to enter or leave the Proposed Project site.
3. Design the Proposed Project such that any truck check-in point is inside the Proposed Project site to ensure no trucks are queuing outside.

⁶ CARB adopted the statewide Truck and Bus Regulation in 2010. The Regulation requires diesel trucks and buses that operate in California to be upgraded to reduce emissions. Newer heavier trucks and buses must meet particulate matter filter requirements beginning January 1, 2012. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent. More information on the CARB's Truck and Bus Regulation is available at: <https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm>

4. Design the Proposed Project to ensure that truck traffic inside the Proposed Project site is as far away as feasible from sensitive receptors.
5. Restrict overnight truck parking in sensitive land uses by providing overnight truck parking inside the Proposed Project site.

Lastly, the South Coast AQMD also suggests that the Lead Agency conduct a review of the following references and incorporate additional mitigation measures as applicable to the Proposed Project in the NEPA document:

1. State of California – Department of Justice: Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act⁷
2. South Coast AQMD 2022 Air Quality Management Plan,⁸ specifically:
 - a) Appendix IV-A – South Coast AQMD’s Stationary and Mobile Source Control Measures
 - b) Appendix IV-B – CARB’s Strategy for South Coast
 - c) Appendix IV-C – SCAG’s Regional Transportation Strategy and Control Measure
3. United States Environmental Protection Agency (U.S. EPA): Mobile Source Pollution - Environmental Justice and Transportation⁹

Thank you for the opportunity to provide comments. 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 me at swang1@aqmd.gov or Danica Nguyen, Air Quality Specialist, at dnguyen1@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

Sam Wang

Program Supervisor, CEQA IGR

Planning, Rule Development & Implementation

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⁷ State of California Department of Justice. Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act. Available at: <https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/warehouse-best-practices.pdf>

⁸ South Coast AQMD, 2022 Air Quality Management Plan. Available at: <http://www.aqmd.gov/home/air-quality/air-quality-management-plans/air-quality-mgt-plan>

⁹ US.EPA. Mobile Source Pollution - Environmental Justice and Transportation. Available at: <https://www.epa.gov/mobile-source-pollution/environmental-justice-and-transportation>