South Coast
Air Quality Management District
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SENT VIA E-MAIL AND USPS: April 17, 2018

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Mitigated Negative Declaration (MND) for the Proposed Redlands Commerce Center

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 build a 190,086-square-foot warehouse building on 8.45 acres (Proposed Project). At the time of the MND, tenants are unknown. Based on a review of Figure 2, *Project Vicinity*, in the MND and aerial photographs, SCAQMD staff found that the Proposed Project is surrounded by industrial and/or commercial uses. Construction of the Proposed Project is expected to take 13 months to complete[1].

SCAQMD Staff's Comments

The Notice of Availability (NOA)/Notice of Intent (NOI) for the MND was updated on April 6, 2018[2]. Upon a review of the NOA/NOI, SCAQMD staff found that the public review and comment period on the MND closes on April 19, 2018[3]. However, the NOA/NOI did not specify the beginning date of the public review and comment period to support that the MND will be publicly circulated for a minimum 20 days pursuant to the CEQA requirements (CEQA Guidelines Section 15072(d)). Additionally, SCAQMD staff received a hardcopy of the MND for review on April 10, 2018, and no appendices or technical documents related to the Proposed Project's air quality analysis (e.g., modeling input and output files and emissions calculation sheets) were included in the MND for review. While the Proposed Project's long-term operational emissions were calculated based on the traffic data from the traffic impact study, this study was not included in the MND for review. Given the limited review time and absence of all files and supporting documentation in both PDF and electronic files, SCAQMD staff is submitting the following comments to the Lead Agency for consideration.

Daily Truck Trip Rate

According to the Air Quality Section, the Proposed Project's long-term operational emissions were calculated based on the traffic data, and the daily truck trips were based on the City of Fontana Truck Trip Generation Study (Fontana Study). In other words, the Fontana Study was used to estimate the Proposed Project's air quality operational impacts in the CalEEMod modeling. Absent from a specific traffic study

[1] MND. Page 3 of 78.
[2] San Bernardino County Land Use Services. Accessed by SCAQMD staff on April 11, 2018. Available at: http://cms.sbcounty.gov/lus/Planning/Environmental/Valley.aspx.
[3] San Bernardino County Land Use Services. Accessed by SCAQMD staff on April 11, 2018. Available at: http://www.sbcounty.gov/Uploads/lus/Environmental/Notice%20of%20Availability%20P201700142.pdf.

of known tenants, SCAQMD staff recommends that the Final MND use the ITE's daily truck trip rate of 0.64 to estimate daily truck trips to avoid underestimating the Proposed Project's truck trips and associated long-term operational emissions and health impacts.

Additional Recommended Mitigation Measures

While the Lead Agency found that the Proposed Project's long-term operational impacts would be less than significant, SCAQMD staff recommends that the Lead Agency incorporate the following mitigation measures in the Final MND to further reduce the Proposed Project's long-term NOx emissions. For more information on potential mitigation measures as guidance to the Lead Agency, please visit SCAQMD's CEQA Air Quality Handbook website[4].

1. Require the use of 2010 and newer haul trucks (e.g., material delivery trucks and soil import/export). In the event that that 2010 model year or newer diesel haul trucks cannot be obtained, provide documentation as information becomes available and use trucks that meet EPA 2007 model year NOx emissions requirements[5], at a minimum. Additionally, consider other measures such as incentives, phase-in schedules for clean trucks, etc.
2. Have truck routes clearly marked with trailblazer signs, so that trucks will not enter residential areas.
3. Develop, adopt, and enforce truck routes in and out of facilities.
4. Limit the daily number of trucks allowed at the facility to levels analyzed in the Final MND. If higher daily truck trips are anticipated to visit the site, the Lead Agency should commit to re-evaluating the Project's impacts through CEQA prior to allowing this land use or higher activity level.
5. Provide electric vehicle (EV) Charging Stations (see the discussion below regarding EV charging stations).
6. Should the Proposed Project generate significant regional emissions, the Lead Agency should require mitigation that requires accelerated phase-in for non-diesel powered trucks. For example, natural gas trucks, including Class 8 HHD trucks, are commercially available today. Natural gas trucks can provide a substantial reduction in health risks, and may be more financially feasible today due to reduced fuel costs compared to diesel. In the Final MND, the Lead Agency should require a phase-in schedule for these cleaner operating trucks to reduce project impacts. SCAQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency and Project applicant.
7. Trucks that can operate at least partially on electricity have the ability to substantially reduce the significant NOx impacts from this project. 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[6]. 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 compared to retrofitting an existing building. Therefore, SCAQMD staff recommends the Lead Agency require the proposed warehouse and other plan areas that allow truck parking 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

[4] South Coast Air Quality Management District. http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook.
[5] 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).
[6] Southern California Association of Governments. Adopted April 7, 2016. Available at: http://scagrtpscs.net/Pages/default.aspx.

parking spaces (including for trucks) include EV charging stations.[7] 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.

8. 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/distribution center and sensitive receptors, if applicable to the Proposed Project.
9. Design the warehouse/distribution center such that entrances and exits are such that trucks are not traversing past neighbors or other sensitive receptors, if applicable to the Proposed project.
10. Design the warehouse/distribution center such that any check-in point for trucks is well inside the Proposed Project to ensure that there are no trucks queuing outside of the facility boundaries.
11. Design the warehouse/distribution center to ensure that truck traffic within the Proposed Project is located away from the property line(s) closest to residences or sensitive receptors, if applicable to the Proposed Project.
12. Restrict overnight parking in residential areas, if applicable to the Proposed Project.
13. Establish overnight parking within the warehouse/distribution center where trucks can rest overnight.
14. Establish designated area(s) within the Proposed Project for repair needs away from residences or sensitive receptors, if applicable to the Proposed Project.

Closing

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 adoption 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 the public who are interested in the Proposed Project.

SCAQMD staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact me at lsun@aqmd.gov if you have any questions regarding the enclosed comments.

Sincerely,

Lijin Sun

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SBC180410-10
Control Number

[7] City of Los Angeles. March 30, 2017. Accessed at: http://ladbs.org/LADBSWeb/LADBS_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf.