



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

March 12, 2019

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Mitigated Negative Declaration (MND) for the Proposed FedEx Parking Lot 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 build a 31-acre surface parking lot with 1,005 stalls for automobiles and long haul tractors and 556 stalls for trailers on 64.8 acres (Proposed Project). The Proposed Project is located at 12685 Holly Street on the northeast corner of North Holly Street and Wilson Street within the Agua Mansa Corridor Specific Plan. Construction of the Proposed Project is expected to last approximately 12 months¹.

SCAQMD Staff's Summary of Air Quality Analysis

In the Air Quality Section, the Lead Agency proposed two air quality mitigation measures. Mitigation Measure III-1 requires that the construction contractor shall use off-road diesel construction equipment that complies with U.S. EPA/CARB Tier 4 emissions standards and shall maintain and tune all construction equipment in accordance with the manufacturer's specifications². Mitigation Measure III-2 requires that the project applicant shall identify, among others, proposed truck travel routes for hauling imported soil to the Proposed Project site to be consistent with the analysis in the MND³.

SCAQMD Staff's General Comments on Air Quality Mitigation Measures

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. SCAQMD staff recommends that the following changes to Mitigation Measure III-2 that the Lead Agency should incorporate in the Final MND.

Mitigation Measures

- III-2* Prior to issuance of grading permits, the project applicant shall identify the source of all imported soil and proposed truck travel routes for hauling imported soil to the project site, which the County shall confirm is consistent with the analysis in the project Initial Study. In the event that the source of all imported soil and proposed truck travel routes for hauling imported soil to the project site is not consistent with the analysis in the project Initial Study, the project applicant is required to re-evaluating the Proposed

¹ MND. Page 2.

² MND. Page 28.

³ *Ibid.*

Project's air quality impacts through CEQA prior to the commencement of any grading and soil hauling activities.

To further reduce the Proposed Project's air quality impacts during operation, SCAQMD staff recommends that the Lead Agency incorporate the following mitigation measure in the Final MND.

- III-3* Proposed truck travel routes for hauling imported soil should avoid traversing past and should be located away from neighbors or other sensitive receptors.
- III-4* Require 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.
- III-5* Provide electric vehicle (EV) charging stations, or at a minimum, require the Proposed Project to be constructed with the appropriate infrastructure to facilitate sufficient electric charging for trucks to plug-in. Electrical hookups should be provided at the onsite truck stop for truckers to plug in any onboard auxiliary equipment. Electrical panels should be appropriately sized to allow for future expanded use.

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, informative, 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

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

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SBC190301-03
Control Number