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Recirculated Draft Environmental Impact Report (DEIR) for the Proposed 9th and Vineyard Development Project (Proposed Project) (SCH No. 2019110456)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The City of Rancho Cucamonga is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff (Staff) has provided a brief summary of the project information and prepared the following comments organized by topic of concern.

South Coast AQMD Staff's Summary of Project Information in the Recirculated DEIR

Based on the Recirculated DEIR, the Proposed Project consists of constructing three warehouse buildings for a total of 982,062 square feet (sq. ft)[1] on a 45.97-acre site.[2] Building 1 would be 611,574 sq. ft with 45 and 49 dock doors on the north side and south side of the building, respectively.[3] Building 2 would be 107,541 sq. ft with 12 dock doors on the east side of the building.[4] Building 3 consists of 262,981 sq. ft with 28 dock doors on the east side of the building.[5] The Proposed Project is bounded by 9th Street to the north, Baker Avenue to the west, Vineyard Avenue to the east, and 8th Street to the south in Rancho Cucamonga.[6] Based on the review of aerial photographs, Staff found that the nearest sensitive receptors (e.g., residential) are adjacent to the north of the Proposed Project site. Construction is expected to last approximately 11 months, commencing in January 2025 and concluding in November 2025.[7]

South Coast AQMD Staff's Comments on the Recirculated DEIR

Inconsistent Information Regarding Daily Truck Trips

According to the Air Quality section in the Recirculated DEIR, the Proposed Project would generate 343 daily truck trips during operation.[8] This number of daily truck trips is consistent with the Trip Generation in Appendix K2 – Final Non-CEQA Transportation Study[9] and the California Emission

[1] Recirculated DEIR. p. 2-8.
[2] *Ibid*. p. 2-2.
[3] *Ibid*. p. 2-8.
[4] *Ibid*.
[5] *Ibid.*
[6] *Ibid*. p. 2-2.
[7] *Ibid*. p. 2-17.
[8] *Ibid*. p. 4.3-21.
[9] Appendix K2. Final Non-CEQA Transportation Study for 9th and Vineyard Avenue Warehouse. p. 27.

Estimator Model (CalEEMod) output files – 9th and Vineyard V2 Isolated Truck Trip Emissions Detailed Report, 7/26/2023.[10] However, Appendix B2 – Health Risk Assessment mentions that the Proposed Project would involve 154 truck trips per day associated with the operation of three warehouse buildings,[11] which is substantially less than and inconsistent with the aforementioned Air Quality section, Appendix K2, and the CalEEMod output files. Therefore, Staff recommends that the Lead Agency revise the number of truck trips and update the calculations accordingly to ensure the correct information is presented in the Final EIR and appendices.

Possible Calculation Errors Relating to Incorrect Emission Rates in Health Risk Assessment (HRA)

According to the Staff's review of the emission calculations spreadsheet for the HRA, provided by the Lead Agency, the calculated idling emission rates for PM10_IDLEX in terms of grams per minute (g/min) appear to have a calculation error possibly due to inaccurate conversion from the grams per vehicle per day (g/veh/day) emission rate to grams per vehicle per minute (g/min). Table 1 shows the calculated emission rate for PM10_IDLEX as presented in the Recirculated DEIR and compares it to the recalculated number.

Table 1: Provided Calculations versus the Staff Recalculated Number.

PM10_IDLEX Emission Rate* (g/veh/day)	PM10_IDLEX (g/hr) Calculation Provided in the Recirculated DEIR**	PM10_IDLEX (g/min) Calculation Performed by South Coast AQMD Staff***
0.031307204	0.001304467	2.174E-05

Key: g/hr: grams per hour
*: from EMFAC2021-ER-2007Class-San Bernadino for the calendar year of 2025.
**: the conversion is calculated as "g/veh/day * 1 day/24 hrs" in the provided emission calculation spreadsheet, and the unit is labeled as g/min instead of g/hr.
***: conversion used to convert g/veh/day to g/min as "g/veh/day * 1 day/24 hrs * 1 hr/60 mins".

In addition, for the PM10_RUNEX emission rates, Staff found that the number of truck trips used in the calculation was not associated with the corresponding warehouse building. For example, according to the spreadsheet provided by the Lead Agency, Buildings 2 and 3 would have 38 and 92 truck trips, respectively. However, in the PM10_RUNEX emissions calculations, the number of trucks associated with Building 1 was applied to Buildings 2 and 3 calculations. Therefore, Staff recommends that the Lead Agency review and revise the emission calculations, rerun the HRA with revised emission rates, and include the results in the Final EIR with all the supporting evidence.

Potential Operational Emissions from Railroad

According to the Project Setting and Surrounding Land Uses section in the Recirculated DEIR, the Burlington Northern and Santa Fe (BNSF) railway is adjacent to the southern boundary of the Proposed Project site.[12] It is unclear whether the Proposed Project plans to utilize the BNSF for goods movement as part of the operation. In the event that BNSF is part of the transportation during operation, it is possible that the operational emissions in the Recirculated DEIR are underestimated. Thus, the Lead Agency is recommended to revise the operational emissions and include those coming from BNSF. If

[10] CalEEMod Output Files - 9th and Vineyard V2 Isolated Truck Trip Emissions Detailed Report, 7/26/2023.
[11] Appendix B2. Health Risk Assessment. p. 1.
[12] *Ibid*. p. 2-3.

BNSF is not part of the Proposed Project's operation, the Lead Agency is recommended to clarify this understanding in the Final EIR.

Additional Recommended Air Quality and Greenhouse Gases Mitigation Measures and Project Design Considerations

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. 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 Final EIR.

Mitigation Measures for Operational Air Quality Impacts

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 Rule and the Heavy-duty Low NOx Omnibus Regulation, 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.

   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. Limit the daily number of trucks allowed at the Proposed Project to levels analyzed in the Final EIR. 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 higher activity level.

4. 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.

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.

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 Final EIR:

1. State of California – Department of Justice: Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act[13]

2. South Coast AQMD 2022 Air Quality Management Plan,[14] 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 Transportation.[15]

South Coast AQMD Air Permits and Role as a Responsible Agency

If implementation of the Proposed Project would require the use of new stationary and portable sources, including but not limited to emergency generators, fire water pumps, boilers, spray booths, etc., air permits from South Coast AQMD will be required, and the role of South Coast AQMD would change from a Commenting Agency to a Responsible Agency under CEQA. In addition, if South Coast AQMD is identified as a Responsible Agency, per CEQA Guidelines Section 15086, the Lead Agency is required to consult with South Coast AQMD. In addition, CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of evaluating the applications for air permits. For these reasons, the Final EIR should include a discussion about any new stationary and portable equipment requiring

[13] 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/system/files/media/warehouse-best-practices.pdf

[14] South Coast AQMD, 2022 Air Quality Management Plan (AQMP). Available at: http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan

[15] United States Environmental Protection Agency (U.S. EPA), Mobile Source Pollution - Environmental Justice and Transportation. Available at: https://www.epa.gov/mobile-source-pollution/environmental-justice-and-transportation

South Coast AQMD air permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project.

The Final EIR should also include calculations and analyses for construction and operation emissions for the new stationary and portable sources, as this information will also be relied upon as the basis for the permit conditions and emission limits for the air permit(s). Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions regarding what types of equipment would require air permits. For more general permit information, please visit South Coast AQMD's webpage at http://www.aqmd.gov/home/permits.

Conclusion

As set forth in California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a-b), the Lead Agency shall evaluate comments from public agencies on the environmental issues and prepare a written response at least 10 days prior to certifying the Final EIR. As such, please provide South Coast AQMD written responses to all comments contained herein at least 10 days prior to the certification of the Final EIR. In addition, as provided by CEQA Guidelines Section 15088(c), if the Lead Agency's position is at variance with recommendations provided in this comment letter, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided.

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 Danica Nguyen, Air Quality Specialist, at dnguyen1@aqmd.gov should you have any questions.

Sincerely,

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