



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:

kstater@cityofhighland.org

Kim Stater, Assistant Community Development Director
City of Highland, Planning Department
27215 Base Line
Highland, California 92346

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**Initial Study/Mitigated Negative Declaration (IS/MND) for the Proposed
Southeast Corner 5th and Victoria Warehouse Project (Proposed Project)
(SCH No: 2024100850)**

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

South Coast AQMD Staff's Summary of Project Information in the IS/MND

Based on the information provided in the IS/MND, the Proposed Project involves the construction of an approximately 173,976-square-foot one-story warehouse building on an approximately 7.23-acre site.¹ The Proposed Project is located at the southeastern corner of 5th Street and Victoria Avenue, Highland.² There would be 83 truck trips per day associated with the operation,³ and trucks would be accessed mainly via two driveways along 3rd Street and 5th Street.⁴ Based on the aerial photograph review, South Coast AQMD staff (Staff) found that the nearest sensitive receptor (e.g., resident) is 90 feet north of the Proposed Project Site. The Proposed Project construction would take approximately nine months.⁵

South Coast AQMD Staff's Comments on the IS/MND

Revision to the Localized Significance Thresholds Analysis During Construction Activities

In section 3.3 Air Quality, the Lead Agency performs localized significance thresholds (LSTs) analysis for a 2.5-acre site within Source Receptor Area 34 with a receptor distance of 70 meters (230 feet) as the nearest sensitive receptor.⁶ However, the Lead Agency also identifies the nearest sensitive receptors as residential uses located approximately 90 feet north of the Proposed Project site.⁷ Staff has verified the distance and found that the nearest sensitive receptors are about 90 feet away. Hence, the LSTs analysis performed in the IS/MND using 70 meters or 230 feet is inaccurate. The Lead Agency is recommended to revise the LSTs analysis for construction, re-evaluate the level of

¹ IS/MND. Page 4.

² *Ibid.* Page 3.

³ *Ibid.* Page 99. Table 24. Project Trip Generation Summary.

⁴ *Ibid.* Page 4.

⁵ *Ibid.* Page 6.

⁶ *Ibid.* Page 27-28.

⁷ *Ibid.* Page 27.

significance, and, in the event that the results are found to be significant, the Lead Agency is suggested to include all feasible mitigation measures to reduce the impacts as applicable.

Completion of CEQA Air Quality Impacts Analysis During Operation Activities

Based on the IS/MND, the lead agency has not provided any LSTs analysis for operation. Pursuant to CEQA guidelines section 15064 - Determining the Significance of the Environmental Effects Caused by a project – the Lead Agency is responsible for performing an in-depth and detailed analysis of an estimation of the potential localized and regional air quality impact analysis. Thus, it is recommended that a table be added in the air quality impact section to evaluate the maximum daily on-site operational emissions using CalEEMod⁸ land use emissions software and, subsequently, compare these emissions against the South Coast AQMD LSTs for operation. It is important to note that the localized analysis can be conducted using the LST screening tables or by performing dispersion modeling. This analysis will provide us with a preliminary assessment of the potential air quality impacts, both at the regional and localized levels, arising from the Proposed Project.

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

In section 3.3 Air Quality, the Lead Agency conducts health risk assessment (HRA) for construction and operation. The HRA results are determined to be less than significant, with a cancer risk (CR) of 6.73⁹ and 9.48¹⁰ in one million for construction and operation, respectively. Although the conclusion is less than significant, the operational CR is relatively high, close to the 10 in one million per South Coast AQMD Air Quality Significance Thresholds.¹¹ Due to the high result of 9.48 in one million, Staff recommends that the Lead Agency consider all feasible mitigations to reduce the CR impacts on the sensitive receptors.

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 MND.

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.

⁸ CalEEMod is available free of charge at www.caleemod.com.

⁹ *Ibid.* Page 32. Table 10. Construction Health Risk Assessment Results – Unmitigated.

¹⁰ *Ibid.* Page 35. Table 12. Operational Health Risk Assessment Results.

¹¹ South Coast AQMD Air Quality Significance Thresholds. Available at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf>.

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 MND. 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 MND:

1. State of California – Department of Justice: Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act¹²

¹² 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>

2. South Coast AQMD 2022 Air Quality Management Plan,¹³ 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.¹⁴

Conclusion

The Lead Agency is recommended to revise the CEQA analysis to address the aforementioned comments and provide the necessary evidence to sufficiently support the conclusions reached. If the requested information and analysis are not included in the final CEQA document, either the Final MND or other type of CEQA document, the Lead Agency should provide reasons for not doing so. Pursuant to California Public Resources Code Section 21092.5(b) and 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 and notify each public agency when any public hearings are scheduled. Please provide South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided. In addition, if the Lead Agency decides to adopt the Final MND, please provide South Coast AQMD with a notice of any scheduled public hearing(s).

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,

Sam Wang

Sam Wang
Program Supervisor, CEQA-IGR
Planning, Rule Development & Implementation

SW:DN
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¹³ 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>

¹⁴ 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>