



# South Coast Air Quality Management District

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City of Rialto  
Development Services Department, Planning Division  
150 South Palm Avenue  
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## **Draft Environmental Impact Report (Draft EIR) for the Proposed CapRock Distribution Center III Warehouse Project (SCH NO. 2015101071)**

The South Coast Air Quality Management District (SCAQMD) 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 EIR.

The Lead Agency proposes the demolition of the existing structures on the approximately 24.37-acre site. The site would be then be developed with a 525,110 square foot high-cube warehouse building for occupants that are not known at this time. The warehouse could operate 24 hours a day, seven days a week with approximately 1,880 total daily trips including 752 daily trucks.<sup>1</sup> Construction is expected to begin in early 2017 and take approximately 10 months to complete.

The Lead Agency has determined that operating emissions primarily from mobile sources exceed the SCAQMD recommended significance threshold for Oxides of Nitrogen (NO<sub>x</sub>). The SCAQMD staff therefore recommends additional measures to reduce the mobile source impacts during operations. Finally, the Final EIR should also include how the Lead Agency will comply with other applicable SCAQMD rules in addition to the rules cited starting on page 4.3-31 in the Air Quality Section. Details are included in the attachment.

Pursuant to Public Resources Code Section 21092.5, SCAQMD staff requests that the Lead Agency provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. The SCAQMD staff is available to work with the Lead Agency to address these issues and any other air quality questions that may arise. Please contact Gordon Mize, Air Quality Specialist CEQA Section, at (909) 396-3302, if you have any questions regarding the enclosed comments.

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<sup>1</sup> DEIR, Traffic Impacts Analysis (LSA Associates, Inc., May 29, 2015) Table L – Trip Generation, Unmodified (Non-Passenger Car Equivalent) Daily Trips.

Sincerely,

*Jillian Wong*

Jillian Wong, Ph.D.  
Planning and Rules Manager  
Planning, Rule Development & Area Sources

Attachment

JW:GM

SBC160802-09  
Control Number

### **Mitigation Measures for Operational Air Quality Impacts (Mobile Sources)**

1. Since the proposed project will exceed the recommended SCAQMD significance threshold for NO<sub>x</sub> from mobile sources during operations, the SCAQMD staff recommends the following additional mitigation measures to further reduce those significant project impacts:

#### Recommended Measures:

- a) Require the use of 2010 compliant diesel trucks, or alternatively fueled, delivery trucks (e.g., food, retail and vendor supply delivery trucks) at commercial/retail sites upon project build-out. Other measures such as incentives, phase-in schedules for clean trucks, etc., should also be considered.
- b) Provide minimum buffer zone of 300 meters (approximately 1,000 feet) between truck traffic and sensitive receptors based on guidance from the California Air Resource Board (CARB) guidance.<sup>2</sup>
- c) Limit the daily number of trucks allowed at each facility 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 project through CEQA prior to allowing this higher activity level.
- d) Design the site such that any check-in point for trucks is well inside the facility to ensure that there are no trucks queuing outside of the facility.
- e) On-site equipment should be alternative fueled.
- f) Provide food options, fueling, truck repair and or convenience stores on-site to minimize the need for trucks to traverse through residential neighborhoods.
- g) Improve traffic flow by signal synchronization.
- h) Similar to the City of Los Angeles requirements for all new projects, the SCAQMD staff recommends that the Lead Agency require at least 5% of all vehicle parking spaces (including for trucks) include EV charging stations.<sup>3</sup>
- i) Provide minimum buffer zone of 300 meters (approximately 1,000 feet) between truck traffic and sensitive receptors.

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<sup>2</sup> CARB: Air Quality and Land Use Handbook: A Community Health Perspective, April 2005, Page4 for Distribution Centers.

<sup>3</sup> [http://ladbs.org/LADBSWeb/LADBS\\_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf](http://ladbs.org/LADBSWeb/LADBS_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf)

**Compliance With SCAQMD Rules**

2. Because of the previous land uses, the proposed demolition and soil disturbance activities could encounter asbestos and contaminated soils. In addition to the SCAQMD rules cited starting on page 4.3-1 in the Air Quality Section, the Lead Agency should also include how the project will comply with the following SCAQMD rules, if applicable: SCAQMD Rule 1403 – Asbestos Emissions from Demolition/Renovation if asbestos is found during the demolition of the residences and other structures; and SCAQMD Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil in the event that contaminated soil is encountered during soil disturbance activities.