



South Coast Air Quality Management District

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Draft Mitigated Negative Declaration (Draft MND) for the Proposed Southwest Regional Operations 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. The Lead Agency proposes to develop an industrial trucking facility consisting of a 19,000 square foot office building; fueling station; truck wash facility; and parking lot.

The Lead Agency determined that regional operational emissions were less than significant. The SCAQMD staff has concerns about the assumptions used in the Air Quality Analysis and Health Risk Assessment, which likely underestimated health risks. The Air Quality Analysis estimates that 120 truck drivers (non "Local Regionals") can sleep/idle in their cabs daily. However, the Air Quality Analysis and Health Risk Assessment assumed that trucks will only idle for 15 minutes and did not include emissions generated from the overnight idling of diesel trucks. SCAQMD staff recommends reevaluating idling times and incorporating those emissions into the analysis. Should the Lead Agency determine after revising the air quality analysis that project operational air quality impacts still exceed the SCAQMD recommended regional daily significance thresholds, the SCAQMD staff recommends mitigation measures be incorporated into the project description and air quality analysis in the Final CEQA document pursuant to Section 15126.4 of the CEQA Guidelines to reduce those impacts below significant levels.

The SCAQMD staff is available to work with the Lead Agency to address these concerns and any other air quality questions that may arise. Please contact Jack Cheng, Air Quality Specialist at (909) 396-2448, if you have any questions regarding these comments. We look forward to reviewing and providing comments for the Final MND associated with this project.

Sincerely,

Jillian Wong

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