



# South Coast Air Quality Management District

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

SENT VIA E-MAIL:

[bfoote@cityofredlands.org](mailto:bfoote@cityofredlands.org)

Brian Foote, Planning Manager/City Planner  
City of Redlands, Planning Division  
35 Cajon Street, Suite 20  
Redlands, California 92373

September 6, 2022

**Draft Environmental Impact Report (EIR) for the Proposed  
Redlands General Plan Transit Villages District and Specific Plan (Proposed Project)  
(State Clearinghouse No.: 2021080622)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The City of Redlands is the Lead Agency under the California Environmental Quality Act (CEQA) for the Proposed Project. The following comments on the air quality mitigation measures and health risk reduction strategies should be included in the Final EIR.

South Coast AQMD Staff's Summary of Project Information in the Draft EIR

Based on the Draft EIR, the Proposed Project consists of amendments to the City of Redland's General Plan (GP2035) to establish a new Transit Village Development (TVD) land use designation to provide infill development of new residential and commercial uses within .5 miles of three new proposed passenger train stations in the City.<sup>1</sup> The proposed project encompasses a 1.5 square-mile area and is within 1000 feet of the 1-10 freeway.<sup>2,3</sup> The TVD is anticipated to be developed by 2040.<sup>4</sup> During this period, the Proposed Project anticipates a new growth of approximately 2,400 residential units, 200 hotel units, and 783,000 square-feet of non-residential uses such as retail commercial, office, and open space and parks.<sup>5</sup>

South Coast AQMD Staff's Comments on the Draft EIR

*Additional Project-Level 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 significant adverse impacts. The Proposed Project is a blueprint for the City's future development. The Draft EIR for the Proposed Project serves as the first-tier, programmatic level analysis that can provide guidance to subsequent, project-level environmental analyses. Therefore, South Coast AQMD staff recommends that the Lead Agency include the following project-level mitigation measures in the Final EIR to further reduce emissions from on-road mobile sources by future development projects that generate and attract heavy-duty diesel-fueled trucks. These mitigation measures will support the efforts in implementing the control measures and strategies identified in the 2016 Air Quality Management Plan.<sup>6</sup>

---

<sup>1</sup> Draft EIR. Executive Summary. Page 1-1.

<sup>2</sup> *Ibid.*

<sup>3</sup> *Ibid.* Project Description. Page 3-11.

<sup>4</sup> *Ibid.* Page 3-1.

<sup>5</sup> *Ibid.* Page 3-22.

<sup>6</sup> South Coast Air Quality Management District. 2017, March. Final 2016 Air Quality Management Plan. <https://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp>

Project-level air quality mitigation measures for operational air quality impacts from mobile sources that the Lead Agency should consider and include in the Final EIR and any subsequent CEQA document and future development project may include the following:

- The Lead Agency should require the use of ZE or NZE heavy-duty trucks by future development projects during operation such as trucks with natural gas engines that meet CARB's adopted optional NOx emission standard of 0.02 g/bhp-hr, if and when feasible. 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<sup>7</sup> and the Heavy-Duty Low NOx Omnibus Regulation,<sup>8</sup> ZE and NZE trucks will become increasingly more available to use. The Lead Agency can and should require future development projects to have a phase-in schedule to incentivize the use of these cleaner operating trucks to reduce any significant adverse air quality impacts. South Coast AQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs. At a minimum, require the use of 2010 model year<sup>9</sup> that meet CARB's 2010 engine emissions standards at 0.01 g/bhp-hr of PM and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks. Require future development projects to include an evaluation of sufficient electricity and supportive infrastructures in the Energy and Utilities and Service Systems Sections in the subsequent, project-level environmental analyses, where appropriate. Future development projects can and should also include the requirement in applicable bid documents, purchase orders, and contracts. Owners and operators of future development projects shall maintain records of all trucks associated with project construction to document that each truck used meets these emission standards, and make the records available for inspection. The Lead Agency should conduct regular inspections at the future development projects.
- Limit the daily number of trucks allowed at future development projects to the levels analyzed in the subsequent, project-level environmental analyses for these projects. If higher daily truck volumes are anticipated to visit the site, additional analysis should be done through CEQA prior to allowing this higher activity level.
- Require future development projects to provide electrical infrastructure and electrical panels, which should be appropriately sized. Electrical hookups should be provided for truckers to plug in any onboard auxiliary equipment.

Project-level air quality mitigation measures for operational air quality impacts from other area sources that the Lead Agency should consider and include in the Final EIR for future development projects may include the following:

- Maximize use of solar energy by installing solar energy arrays.

---

<sup>7</sup> CARB. June 25, 2020. *Advanced Clean Trucks Rule*. Accessed at: <https://ww2.arb.ca.gov/our-work/programs/advanced-clean-trucks>.

<sup>8</sup> CARB has recently passed a variety of new regulations that require new, cleaner heavy-duty truck technology to be sold and used in state. For example, on August 27, 2020, CARB approved the Heavy-Duty Low NOx Omnibus Regulation, which will require all trucks to meet the adopted emission standard of 0.05 g/hp-hr starting with engine model year 2024. Accessed at: <https://ww2.arb.ca.gov/rulemaking/2020/hdomnibuslownox>.

<sup>9</sup> CARB adopted the statewide Truck and Bus Regulation in 2010. The Regulation requires diesel trucks and buses that operate in California to be upgraded to reduce emissions. Newer heavier trucks and buses must meet particulate matter filter requirements beginning January 1, 2012. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent. More information on the CARB's Truck and Bus Regulation is available at: <https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm>.

- Use light colored paving and roofing materials.
- Utilize only Energy Star heating, cooling, and lighting devices, and appliances.

Design considerations that the Lead Agency should consider and include in the Final EIR for future development projects to further reduce air quality and health risk impacts include the following:

- Clearly mark truck routes with trailblazer signs, so that trucks will not travel next to or near sensitive land uses (e.g., residences, schools, day care centers, etc.).
- Design future development projects 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 project site.
- Design future development projects such that any check-in point for trucks is inside the project site to ensure that there are no trucks queuing outside.
- Design a future development project to ensure that truck traffic inside the project site is as far away as feasible from sensitive receptors.
- Restrict overnight truck parking in sensitive land uses by providing overnight truck parking inside the future development project site.

#### *Health Risk Assessment (HRA) and Health Risk Reduction Strategies*

Notwithstanding the court rulings, South Coast AQMD staff recognizes that the lead agencies that approve CEQA documents retain the authority to include any additional information they deem relevant to assessing and mitigating the environmental impacts of a project. Because of South Coast AQMD staff's concern about the potential public health impacts of siting sensitive populations within close proximity of freeways or other sources of air pollution, South Coast AQMD staff recommends that, prior to approving future development projects, the lead agency consider the impacts of air pollutants on people who will live in a new project and provide mitigation where necessary.

#### *HRA Analysis*

Implementation of the Proposed Project would result in new development of sensitive land uses within 1,000 feet of train stations, freeways such as the 1-10, and warehouses. To facilitate implementation of the Proposed Project's mitigation measure AQ-10,<sup>10</sup> which requires new development that would locate sensitive uses adjacent to sources of toxic air contaminants (TAC) to submit an HRA to the City prior to future discretionary project approval, South Coast AQMD staff recommends that the Lead Agency include a discussion on mobile source HRA analysis<sup>11</sup> in the Final EIR to provide guidance for subsequent, project-level environmental analyses. This discussion will demonstrate that the Lead Agency has adequately considered the potential health risk impacts from implementing the Proposed Project and that a subsequent, project-level HRA analysis will be completed to disclose health risk impacts at a later stage. Furthermore, the Lead Agency should include the following health risk reduction strategies in the Final EIR as guidance for future sensitive land use development projects that will be sited near freeways, train stations, warehouses or other sources of air pollution.

#### *Health Risk Reduction Strategies*

Many strategies are available to reduce exposures, including, but not limited to, building filtration systems with MERV 13 or better, or in some cases, MERV 15 or better is recommended; building design,

---

<sup>10</sup> DEIR. 5.2 Air Quality. Page 5.2-27.

<sup>11</sup> South Coast AQMD. "Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis." Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.

orientation, location; vegetation barriers or landscaping screening, etc. Enhanced filtration units are capable of reducing exposures. However, enhanced filtration systems have limitations. For example, in a study that South Coast AQMD conducted to investigate filters,<sup>12</sup> a cost burden is expected to be within the range of \$120 to \$240 per year to replace each filter panel. The initial start-up cost could substantially increase if an HVAC system needs to be installed and if standalone filter units are required. Installation costs may vary and include costs for conducting site assessments and obtaining permits and approvals before filters can be installed. Other costs may include filter life monitoring, annual maintenance, and training for conducting maintenance and reporting. In addition, because the filters would not have any effectiveness unless the HVAC system is running, there may be increased energy consumption. It is typically assumed that the filters operate 100 percent of the time while residents are indoors, and the environmental analysis does not generally account for the times when the residents have their windows or doors open or are in common space areas of the project. These filters have no ability to filter out any toxic gases. Furthermore, when used filters are replaced, replacement has the potential to result in emissions from the transportation of used filters at disposal sites and generate solid waste. Therefore, the presumed effectiveness and feasibility of any filtration units should be carefully evaluated in more detail prior to assuming that they will sufficiently alleviate exposures to diesel particulate matter emissions.

### Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), South Coast AQMD staff requests that the Lead Agency provide South Coast AQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, issues raised in the comments should be addressed in detail 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 will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and to the public who are interested in the Proposed Project.

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 Evelyn Aguilar, Air Quality Specialist, at [eaguilar@aqmd.gov](mailto:eaguilar@aqmd.gov) should you have any questions.

Sincerely,

*Sam Wang*

Sam Wang

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

SW:EA

SBC220726-04

Control Number

---

<sup>12</sup> This study evaluated filters rated MERV 13 or better. Accessed at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf>. Also see 2012 Peer Review Journal article by South Coast AQMD: <https://onlinelibrary.wiley.com/doi/10.1111/ina.12013>.