



# 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 AND USPS:  
[ggibson@rialto.gov](mailto:ggibson@rialto.gov)

August 3, 2016

Gina Gibson, Planning Manager  
City of Rialto, City Hall  
Development Services Department  
150 South Palm Avenue  
Rialto, CA 92376

## **Draft Subsequent Environmental Impact Report (Draft SEIR) for the Proposed Renaissance Specific Plan Project (SCH # 2006071021)**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The SCAQMD staff had previously commented the project on September 22, 2010. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final SEIR.

The proposed project amends the 2010 Renaissance Specific Plan (RSP) by relocating businesses and industrial uses to the west of Linden Avenue and relocating all residential uses and the public park east of Linden Avenue. In the 2010 RSP, the residential uses were sited further west of Linden Avenue and were closer to the SR-210 Freeway. In the Draft SEIR, the revised RSP includes a reconfiguration of retail development north of sensitive receptor uses (residences and a school) and business center uses including Planning Area 108 (PA 108). PA 108 includes three buildings that are designated for larger industrial, warehouse distribution and manufacturing uses with a total building space of approximately 4.0 million square feet on about 174 acres.<sup>1</sup> Based on the siting of the industrial/warehouse uses, some residences will be located 100-400 feet<sup>2</sup> from where trucks will be operating. Based on the air quality analysis, the Lead Agency had determined in the previous DEIR that project operations will generate significant regional operational impacts, mostly from mobile sources, that will exceed the SCAQMD recommended daily significance thresholds for Volatile Organic Compounds (VOCs), Oxides of Nitrogen (NO<sub>x</sub>), Carbon Monoxide (CO), Particulate Matter PM<sub>10</sub> and PM<sub>2.5</sub>. The Lead Agency has concluded that the proposed project will result in a net increase in operations in emissions from both stationary (consumer products, landscape equipment, general energy and solid waste) and mobile-sources.

The SCAQMD staff has concerns that the Draft SEIR does not analyze the health impacts to the relocated residential uses and recommends that the Lead Agency update the HRA in the Final SEIR to disclose the health risks from the revised RSP. Additionally, the SCAQMD staff recommends that at all feasible mitigation measures, in addition to those included in the Draft SEIR, be included in the Final SEIR in order to further reduce the estimated significant regional operational air quality impacts. Further details are included in the attachment.

<sup>1</sup> DSEIR, Figure 3-6: Planning Area 108 Conceptual Site Plan.

<sup>2</sup> DSEIR, 400 feet - Page 4-2-27. 100 feet – Page 4.2-28.

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 SEIR. Further, staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist, at (909) 396-3302, if you have any questions regarding the enclosed comments.

Sincerely,

*Jillian Wong*

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

Attachment

JW:GM

SBC160705-15  
Control Number

### Health Risk Assessment

1. In the revised project description, some of the proposed sensitive receptor land uses would be sited 100-400 feet from PA 108, which includes land uses that generate carcinogenic diesel particulate emissions (DPM)<sup>3</sup> from daily truck operations. Although the Lead Agency concludes that no new significant air quality impacts would occur under the proposed revised RSPA, the Lead Agency does not disclose how the changes to the siting of PA 108 and the nearby residential uses affects the previous HRA conclusions included in the 2010 DEIR. The SCAQMD staff recommends that the Lead Agency include a discussion of the health impacts during operations in the Final SEIR based on the revised RSP changes.

### Warehouse/Distribution Center Operational Mitigation Measures

2. In the Draft SEIR, the Lead Agency determined that the project's regional operational emissions, primarily from mobile sources,<sup>4</sup> are significant and unavoidable for Volatile Organic Compounds (VOCs), Oxides of Nitrogen (NOx), Carbon Monoxide (CO), and Particulate Matter (PM10 and PM2.5). The SCAQMD staff recommends that the Lead Agency include the mitigation measures from the SCAQMD staff's previous comment letter (dated September 22, 2010), as well as those listed below, in order to further reduce air quality impacts..

### Recommended changes:

- a) The SCAQMD staff recommends including the project design feature 4.7.6 on page 4.7-31 in the Final SEIR as an enforceable measure, a condition of occupancy, and/or a conditional use permit, etc., as amended below:

“The Renaissance Specific Plan (TPC 2009) has designated truck routes in and around the project site which are intended to direct on-site truck traffic westward to Alder Avenue and away from residential areas. Truck trips are restricted on those portions of Linder Avenue and Renaissance Parkway that are adjacent to residentially designated areas to local deliveries (no through trips) as well as through trips on Ayala Drive.”

For emphasis, the following is reiterated from our previous comment:

- b) Have truck routes clearly marked with trailblazer signs, so trucks will not enter residential areas or restricted routes.

### Recommended additions:

### Additional Mitigation Measures - Truck Activities

3. Trucks that can operate at least partially on electricity have the ability to substantially reduce the significant NOx impacts from this project. Further, trucks that run at least partially on electricity are projected to become available during the life of the project as discussed in the 2012 and 2016 Regional Transportation Plan. It is important to make this electrical

---

<sup>3</sup> DPM has been determined to be a carcinogenic by the CARB.

<sup>4</sup>DSEIR, Table 4.2-12, Significant for Regional Operational Volatile Organic Compounds (VOCs), Oxides of Nitrogen (NOx), Carbon Monoxide (CO), and Particulate Matter (PM10 and PM2.5).

infrastructure available when the project is built so that it is ready when this technology becomes commercially available. The cost of installing electrical charging equipment onsite is significantly cheaper if completed when the project is built compared to retrofitting an existing building. Therefore, the SCAQMD staff recommends the Lead Agency require the proposed warehouse and other plan areas that allow truck parking to be constructed with the appropriate infrastructure to facilitate sufficient electric charging for trucks to plug-in.

4. Consistent with the advisory recommendations from the California Air Resources Board's Land Use Handbook<sup>5</sup> provide minimum buffer zone of 1,000 feet between truck traffic and sensitive receptors if significant health risk impacts are determined by a project specific HRA.
5. Limit the daily number of trucks allowed at each facility to levels analyzed in the Final SEIR. 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.
6. 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>6</sup>.

---

<sup>5</sup> CARB Air Quality and Land Use Handbook, April 2005, Page 4. <http://www.aqmd.gov/docs/default-source/ceqa/handbook/california-air-resources-board-air-quality-and-land-use-handbook-a-community-health-perspective.pdf?sfvrsn=0>

<sup>6</sup> [http://ladbs.org/LADBSWeb/LADBS\\_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf](http://ladbs.org/LADBSWeb/LADBS_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf) .