



# 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:

[dcasey@rialtoqa.gov](mailto:dcasey@rialtoqa.gov)

December 1, 2016

Daniel Casey, Associate Planner  
City of Rialto – Planning Division  
150 S. Palm Ave.,  
Rialto, CA 92376

## **Draft Mitigated Negative Declaration (MND) for the Proposed Prologis Rialto Project**

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 IS/MND.

In the project description, the Lead Agency proposes to construct a distribution warehouse totaling 473,455 square feet on approximately 21.61 acres. Based on the Project's traffic study, the Project will result in 1030 daily passenger cars and 673 daily heavy duty trucks operating at the site. In the Air Quality Section, the Lead Agency quantified the project's construction and operation air quality impacts and has compared those impacts with the SCAQMD's recommended regional and localized daily significance thresholds. The Lead Agency determined that regional daily operational NOx emissions were less than significant after incorporating mitigation measures. SCAQMD staff recommends several changes to the proposed mitigation measures. Details are included in the attachment.

Additionally, since the project includes demolition, the Lead Agency must comply with SCAQMD Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities. Please provide additional information regarding compliance with SCAQMD Rule 1403 in the Final IS/MND.

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 IS/MND associated with this project.

Sincerely,

*Jillian Wong*

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

Attachment  
JW:JC  
SBC161115-02  
Control Number

**Attachment****Recommended Changes Mobile Source Operational Mitigation Measures****Mitigation Measure AQ-2**

Prior to issuance of occupancy permits or business licenses, future building tenants shall provide a business plan to the City Planning Manager identifying operational practices that will be implemented to ensure that truck and other activities do not result in emissions of oxides of nitrogen that exceed the South Coast Air Quality Management District's (SCAQMD) daily threshold. Common structural, nonstructural, and operational options developed by SCAQMD are enumerated by the City below.

- Tenant fleet shall consist of EPA model year 2010 or newer higher efficiency engine year models
- Work with contract drivers who are in compliance with state regulations regarding engine make year EPA model year 2010 or newer.
- ~~Cap deliveries and pick-ups on a daily basis.~~ Limit the daily number of trucks allowed at each facility 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 project through CEQA prior to allowing this higher activity level.
- Accelerated phase-in for non-diesel powered trucks. For example, natural gas trucks, including Class 8 HHD trucks, are commercially available today. Natural gas trucks can provide a substantial reduction in health risks, and may be more financially feasible today due to reduced fuel costs compared to diesel. In the Final CEQA document, the lead agency should require a phase-in schedule for these cleaner operating trucks to reduce project impacts. SCAQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the lead agency and project applicant.
- Use alternatively-fueled on-site equipment.

**Additional Mobile Source Operational Mitigation Measures**

- 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>[2]</sup>.
- 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 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.

---

<sup>[2]</sup> [http://ladbs.org/LADBSWeb/LADBS\\_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf](http://ladbs.org/LADBSWeb/LADBS_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf).