



# South Coast Air Quality Management District

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Dan Fairbanks, Planning Director  
March Joint Powers Authority – Planning Department  
23555 Meyer Drive  
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## **Draft Environmental Impact Report (DEIR)** **for the Proposed Freeway Business Center Project (SCH No. 2015031015)**

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 EIR.

The Lead Agency proposes construction and operation of an industrial warehouse building with office space for unknown tenants/occupants on approximately 39.4-acre undeveloped site. The total building size is approximately 709,083 total square feet including 694,083 square feet of warehouse space with the remaining 15,000 square feet planned for office use. Based on the traffic study,<sup>1</sup> the proposed project will generate 1,191 total daily trips during project operations including 454 daily truck trips. Construction of the proposed business center is scheduled to begin in 2016 with the opening year planned for 2019.

Since the Lead Agency has determined that project operational air quality impacts exceed the SCAQMD recommended regional daily significance threshold for NO<sub>x</sub> almost five-fold, mostly from truck emissions, the SCAQMD staff recommends additional mitigation measures to further reduce the significant operational impacts. 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. 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 CEQA Section, at (909) 396-3302, if you have any questions regarding the attached comments.

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<sup>1</sup> Traffic Impact Analysis (Urban Crossroads 2015), Project Trip Generation, Page 4.11-38.

Sincerely,

*Jillian Wong*

Jillian Wong, Ph.D.  
Program Supervisor, CEQA  
Planning, Rule Development & Area Sources

Attachment

JW:GM

RVC160510-02  
Control Number

### **Additional Mitigation Measures – Truck Activities**

- ❖ Since the Lead Agency has determined that the proposed project's operational NOx impacts are significant and unavoidable, mostly from truck operations, the SCAQMD staff recommends the following additional mitigation measures to further reduce those impacts.
  - 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 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.
  - Consistent with the advisory recommendations from the California Air Resources Board's Land Use Handbook,<sup>2</sup> provide minimum buffer zone of 1,000 feet between truck traffic and sensitive receptors.
  - 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.
  - 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>.

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<sup>2</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>3</sup> [http://ladbs.org/LADBSWeb/LADBS\\_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf](http://ladbs.org/LADBSWeb/LADBS_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf)