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Sent via email

Sean McPherson:

Thank you for providing the California Air Resources Board (CARB) with the opportunity to comment on the El Camino Project (Project) Draft Environmental Impact Report (DEIR), State Clearinghouse No. 2023080369. The Project proposes to expand an existing beverage distribution facility by demolishing up to 237,895 square feet of existing buildings and construct up to 1,054,541 square feet of new manufacturing, light industrial, and office uses on a Project site of 30.1 acres. The Project is proposed to be developed in two phases. Phase 1 includes the demolition of approximately 175,685 square feet of existing structures, the reuse of 32,890 square feet of existing building space, and the construction of 959,441 square feet of new office, light industrial, and warehouse facilities, including a multi-level parking structure. Phase 2 focuses on redeveloping roughly four acres in the northern portion of the site, where an existing building is located, and offers two alternatives. Phase 2A would retain and repurpose the existing 62,210-square-foot building for light industrial use, while Phase 2B would demolish that building and construct a new 40,085-square-foot light industrial facility in its place. Once fully built, the proposed Project would result in up to 3,230 daily vehicle trips along local roadways, including 1,300 daily truck trips.¹ The Project is proposed within the City of Rancho Cucamonga (City), California, which is the lead agency for California Environmental Quality Act (CEQA) purposes.

CARB staff are concerned that the Project will expose nearby residential communities to elevated levels of air pollution beyond the existing baseline emissions at the Project site. Residences are located to the east and southeast of the Project site, with the closest residence located within 1,798 feet of the Project's northwesternmost boundary. In addition to residences, Cucamonga Elementary School, Ontario Charter School Elementary School, and Rancho Cucamonga Middle School are located within two miles of the Project. These residences and schools are located near existing toxic diesel particulate matter (diesel PM) emission sources, which include existing industrial facilities, aircraft traffic from Ontario

¹ City of Rancho Cucamonga. El Camino Project Draft Environmental Impact Report. Page 4.17-13. Table 4.17-2. Accessible at *https://ceqanet.opr.ca.gov/2023080369/4/Attachment/CIhHJY*

International Airport, rail traffic along existing rail lines, and vehicular traffic along State Routes 10 and 15.

The State of California has placed additional emphasis on protecting local communities from the harmful effects of air pollution through the passage of Assembly Bill 617 (AB 617) (Garcia, Chapter 136, Statutes of 2017). AB 617 is a significant piece of air quality legislation that highlights the need for further emission reductions in communities with high exposure burdens, like those in which the Project is located. Diesel PM emissions generated during the construction and operation of the Project would negatively impact neighboring communities.

Through its authority under Health and Safety Code section 39711, the California Environmental Protection Agency (CalEPA) is charged with the duty to identify disadvantaged communities. CalEPA bases its identification of these communities on geographic, socioeconomic, public health, and environmental hazard criteria (Health and Safety Code, section 39711, subsection (a)); In this capacity, CalEPA currently defines a disadvantaged community, from an environmental hazard and socioeconomic standpoint, as a community that scores within the top 25% of the census tracts as analyzed by the California Communities Environmental Health Screening Tool Version 4.0 (CalEnviroScreen). CalEnviroScreen uses a screening methodology to help identify California communities currently disproportionately burdened by multiple sources of pollution. The census tract containing the Project is within the top 74% for Pollution Burden. Although not classified as a disadvantaged community, the City must ensure that the Project does not adversely impact neighboring disadvantaged communities.

Industrial developments, such as those proposed under the Project, can result in high daily volumes of heavy-duty diesel truck traffic and operation of on-site equipment (e.g., forklifts and yard tractors) that emit toxic diesel emissions, and contribute to regional air pollution and global climate change.² Due to the Project's proximity to residences and schools already disproportionately burdened by multiple sources of pollution, CARB's comments below express concerns with the potential cumulative air quality impacts associated with the construction and operation of the Project. To protect the health of these communities, City and applicant have an obligation to construct and operate the Project using the zero-emission technologies provided in this letter.

² With regard to greenhouse gas emissions from this project, CARB has been clear that local governments and project proponents have a responsibility to properly mitigate these impacts. CARB's guidance, set out in detail in the Scoping Plan issued in 2022, explains that in CARB's expert view, local mitigation is critical to achieving climate goals and reducing greenhouse gases below levels of significance. CARB's 2022 Scoping Plan for Achieving Carbon Neutrality, published November 16, 2022, is available at *https://ww2.arb.ca.gov/sites/default/files/2022-12/2022-sp_1.pdf*

The City Used Inappropriate Trip Lengths When Modeling the Project's Air Quality Impacts from Mobile Sources

The City may have underestimated mobile source air pollutant emissions in the DEIR by relying on unrealistic truck trip lengths. According to the California Emissions Estimator Model (CalEEMod) input files presented in Appendix C (Air Quality, Health Risk, GHG, and energy DATA) of the DEIR, the Project's mobile air quality impacts were modeled assuming trucks would travel a maximum distance of 38 miles. The City does not provide any substantial evidence in the DEIR explaining why this would be a conservative trip distance. Since trucks serving the Project may originate from the Ports of Long Beach and Los Angeles, which are approximately 57 miles from the Project site, CARB urges the City to use Project-specific truck trip distances in their air quality impact analysis. Unless the City reevaluates or provides substantiation for the designated truck trip lengths, the Project should include a mitigation measure or project design feature that restricts trucks from traveling a distance greater than what was analyzed in the DEIR.

The City Used Inappropriate Assumptions When Modeling the Project's Health Risk Impacts

The Health Risk Analysis (HRA) prepared for the Project and presented in Section 4.3 (Air Quality) of the DEIR concluded that residences near the Project site would be exposed to diesel PM emissions that would result in cancer risks of approximately 8.1 chances per million during the combined construction and operation of the Project. Since the Project's cancer risks were below the South Coast Air Quality Management District's 's (SCAQMD) significance threshold of 10 chances per million, the DEIR concluded that the Project would have a less than significant health risk impact. CARB is concerned that the City may have underestimated the Project's potential health risk impacts by relying on modeling assumptions not supported by substantial evidence.

The City may have underestimated the Project's operational health risk impacts by assuming an idling duration for onsite heavy-duty trucks that is not supported by substantial evidence. The City assumed an idling duration of 15 minutes for onsite heavy-duty trucks when evaluating the Project's health risk impacts. CARB's Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling (ATCM) restricts trucks from idling longer than five minutes. However, the ATCM has an exemption for trucks equipped with a diesel engine meeting the optional nitrogen oxides (NOx) idling emissions standard when operating outside of 100 feet of a restricted area (e.g., residences, schools).³ Because trucks starting with model year 2008+ are clean-idle certified, many of the trucks operating within the Project site could idle longer than five minutes. According to Table 4.4.2-5 of the EMFAC2021 Volume III Technical Document, heavy-duty trucks can idle for as long as

³ CARB. Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling. Accessible at *https://ww2.arb.ca.gov/sites/default/files/2022-06/13_CCR_2485_OAL_06222022-2_ADA_06272022_0.pdf*

approximately five hours in any one location, well above the 15 minute idling duration assumed in the HRA.⁴ To fully evaluate the Project's potential unmitigated health risk impacts, the City must revise the Project's HRA to assume a heavy-duty truck idling duration supported by substantial evidence.

The Project's operational HRA did not evaluate potential health risk impacts from the operation of trucks and trailers with transport refrigeration units (TRUs) visiting the Project site.⁵ TRUs on trucks and trailers can emit large quantities of diesel PM while operating within the Project site and along local roadways. Residences and other sensitive receptors (e.g., daycare facilities, senior care facilities, and schools) located near where these TRUs could be operating, would be exposed to diesel PM that could result in a significant air quality impact. According to the Section 3.5 (Project Characteristics) of the DEIR, the Project would include 1,000 square feet of cold storage space. Although the Project would include cold storage space, the City states in the DEIR that health risk impacts associated with trucks and trailers with TRUs were not evaluated "since the facility would only include approximately 1,000 square feet of warehousing space dedicated to cold storage."⁶ To fully understand the Project's potential health risk impacts to neighboring communities, the operational HRA should be revised to include the potential health risk impacts associated with the on- and off-site operation of trucks and trailers with TRUs visiting the Project site.

The Project's operational HRA does not account for all nearby residential receptors. Based on CARB's review of Appendix C3.3 (Health Risks) of the Draft EIR, the City's modeling identifies the maximum exposed individual receptor as being located southeast of the Project site. However, aerial imagery reviewed by CARB indicates the presence of additional residences to the northwest of the Project site, specifically near the intersection of Haven Avenue and 26th Street, approximately 1,798 feet from the site's northwestern boundary. These residences were not included in the Project's AERMOD receptor grid. To accurately evaluate the Project's health risk impacts, these northwest residences should be incorporated into the HRA to ensure a complete and representative analysis of potential community exposure.

⁴ CARB. EMFAC2021 Volume III Technical Document. Page 161. Table 4.4.2-5. Accessible at https://ww2.arb.ca.gov/sites/default/files/2021-03/emfac2021_volume_3_technical_document.pdf

⁵ TRUs are refrigeration systems powered by integral diesel engines that protect perishable goods during transport in an insulated truck and trailer vans, rail cars, and domestic shipping containers.

⁶ City of Rancho Cucamonga. El Camino Project Draft Environmental Impact Report. Page4.3-39. Accessible at *https://ceqanet.opr.ca.gov/2023080369/4/Attachment/CIhHJY*

The City Does Not Analyze Potential Air Quality Impacts from the Project's Transport Refrigeration Units

As previously discussed, The City did not estimate the potential air quality impacts associated with trucks and trailers with TRUs serving the Project.⁷ The unmitigated air pollutant emission estimates provided in Section 4.3 (Air Quality) of the DEIR, were modeled using the CalEEMod. Although CalEEMod can estimate air pollutant emissions from area, energy, and mobile sources, the current version of CalEEMod does not account for air pollutant emissions from trucks and trailers with TRUs. Since a portion of the Project could be used for cold storage, CARB urges the City to model and report the Project's air pollution emissions from the operation of on and off site TRUs using CARB's latest emission factors. The City should assume that a percentage of the Project's truck fleet is equipped with TRUs and should estimate the idling duration for each TRU; assumptions should be supported by substantial evidence, and estimates of TRU percentage and idling time should be conservative from a health protection standpoint.

The City Must Include Meaningful Mitigation Measures to Reduce the Project's Potentially Significant Impact on Air Quality

The City concluded in Section 4.3 (Air Quality) of the DEIR that the operation of the Project would result in a potentially significant impact on air quality. According to Tables 4.3-23 (Unmitigated Operation – Phase 1 Regional Emissions Estimates) and 4.3-24 (Unmitigated Project Operation – Phase 2 Regional Emissions Estimates) of the DEIR, the operation of the Project emit NOx emissions as high as approximately 169 pounds per day, which would exceed the SCAQMD's 55 pounds per day significance threshold and would result in a significant impact on air quality.⁸ To mitigate the Project's operational air quality impacts, the DEIR includes five mitigation measures (Mitigation Measure AIR-2A through AIR-2E), which include requiring applicants to follow the voluntary Tier 1 clean air vehicle parking and EV charging rules from the California Green Building Code, implementing a commute trip reduction program, prohibiting diesel-fueled TRUs onsite, and requiring the installation of electric power to power onsite electric TRUs. Even after implementation of Mitigation Measure AIR-2A through AIR-2E, the City concludes in the DEIR that the Project's operational emissions of NOx would result in a significant and unavoidable impact on air quality.

⁷ TRUs are refrigeration systems powered by integral diesel engines that protect perishable goods during transport in an insulated truck and trailer vans, rail cars, and domestic shipping containers.

⁸ City of Rancho Cucamonga. El Camino Project Draft Environmental Impact Report. Table 4.3-23 through Table 4.3-24. Page 4.3-55. Accessible: *https://ceqanet.opr.ca.gov/2023080369/4/Attachment/ClhHJY*

While CARB commends the City for requiring all trucks and trailers with TRUs to be electric and for requiring the installation of electric infrastructure to support electric TRUs. CARB urges the City revise Mitigation Measure AIR-2E to include one of the following mitigation measures in the DEIR:

- Require contractual language in tenant lease agreements that prohibits tenants from operating diesel powered TRUs within the Project-site; or
- A condition requiring a restrictive covenant over the parcel that prohibits the applicant's use of TRUs on the property unless the applicant seeks and receives an amendment to its conditional use permit allowing such use.

To further reduce the health risk impacts of the Project, particularly those related to diesel PM and other toxic air contaminants (TACs), CARB urges the City to implement the following emission reduction measures as either project design features or mitigation measures in the DEIR.

- Include contractual language in tenant lease agreements that requires future tenants to exclusively use zero-emission light and medium-duty delivery trucks and vans.
- Include contractual language in tenant lease agreements that requires all service equipment (e.g., yard hostlers, yard equipment, forklifts, and pallet jacks) used within the project site to be zero-emission.
- Include contractual language in tenant lease agreements that requires all heavy-duty trucks entering or on the project site to be zero-emission, and to be fully zero-emission. Incentive funds can be obtained from the Carl Moyer Program and Voucher Incentive Program.⁹
- Include contractual language in tenant lease agreements restricting trucks and support equipment from idling longer than two minutes while on site.
- Include rooftop solar panels for each proposed industrial building to the extent feasible, with a capacity that matches the maximum allowed for distributed solar connections to the grid.
- Include contractual language in tenant lease agreements, requiring all emergency generators to be powered by a non-diesel fuel.

These measures are not only technically and economically feasible, but also consistent with the increasing availability of zero-emission technologies in the heavy-duty transportation and industrial sectors. Implementing these requirements will significantly reduce health risks, improve local air quality, and ensure that the Project does not exacerbate existing environmental burdens.

⁹. Carl Moyer Program and Voucher Incentive Program. *https://ww2.arb.ca.gov/carl-moyer-program-apply*

Conclusion

CARB is concerned about the Project's air quality and public health impacts. To fully assess the Project's impact on neighboring communities, the City must evaluate the potential air quality and health risk impacts associated with trucks and trailers with TRUs visiting the Project site and assess air quality impacts using trip distances supported by substantial evidence. The HRA should be updated to include a justification for the assumed 15-minute truck idling duration and health risk impacts from on- and off-site trucks and trailers with TRUs. Lastly, to mitigate the Project's significant and unavoidable impact on air quality, CARB urges the City to include a mitigation or design measure in the DEIR that requires trucks serving the Project to be zero-emission at the start of operations.

CARB appreciates the opportunity to comment on the DEIR for the Project. Given the breadth and scope of projects subject to CEQA review throughout California that have air quality and greenhouse gas impacts, coupled with CARB's limited staff resources to substantively respond to all issues associated with a project, CARB must prioritize its substantive comments here based on staff time, resources, and its assessment of impacts. CARB's deliberate decision to substantively comment on some issues does not constitute an admission or concession that it substantively agrees with the lead agency's findings and conclusions on any issues on which CARB does not submit substantive comments.

CARB staff can provide assistance with zero-emission technologies and emission reduction strategies, as needed. Please include CARB on your list of selected State agencies that will receive the Final Environmental Impact Report (FEIR). If you have questions, please contact Stanley Armstrong, Air Pollution Specialist via email at *stanley.armstrong@arb.ca.gov*.

Sincerely,

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