



# memo riverside

---

to Sean Reilly, Planner Principal Planner, City of Redlands  
from Bob Prasse, Director of Environmental Services, MIG  
re 301 Tennessee Street Warehouse Mitigated Negative Declaration, Response to Comments  
date September 13, 2023

---

The City of Redlands issued a Notice of Intent to Adopt a Mitigated Negative Declaration (MND) for the proposed 301 Tennessee Street Warehouse Project on May 4<sup>th</sup>, 2023 initiating a 30-day public review period for the MND that ended on June 2<sup>nd</sup> 2023. During the public review period the three comments letters listed below were received on the MND.

- San Bernardino County Department of Public Works – May 18, 2023
- South Coast Air Quality Management District (SCAQMD) – June 2, 2023
- Blum, Collins and Ho, LLP, representing the Golden State Environmental Justice Alliance – June 1, 2023

Another letter, dated June 26<sup>th</sup>, 2023, was also received by the City from the Golden State Environmental Justice Alliance withdrawing their June 1, 2023 comment as well as their opposition to the project. The remaining two letters are included and marked to identify specific comments within each letter. Each of the two letters is followed by detailed responses to each comment. None of the comments from the San Bernardino County Department of Public Works or the SCAQMD identified new, avoidable significant effects not addressed by the MND, nor will they require the imposition of new mitigation measures.



# South Coast Air Quality Management District

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

SENT VIA E-MAIL:

June 2, 2023

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

Sean Reilly, Principal Planner  
City of Redlands, Planning Department  
35 Cajon Street, Suite 15-A  
Redlands, California 92373

**Mitigated Negative Declaration (MND) for the Proposed  
301 Tennessee Street Warehouse Project (Proposed Project)  
(State Clearinghouse Number: 2023050084)**

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 California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. The following comments recommended revisions to the localized construction and operation impacts analysis, CEQA regional air quality impacts analysis for cleanup activities during construction, construction mitigation measures, additional recommended air quality mitigation measures, South Coast AQMD Rules 2305 and 316, and information about South Coast AQMD permits and responsible agency that the Lead Agency should include in the Final MND.

A-1

**South Coast AQMD Staff’s Summary of Project Information in the MND**

Based on the MND, the Proposed Project proposes developing an approximately 197,397 square feet light industrial warehouse building and demolishing an existing manufacturing warehouse and a single-family house.<sup>1</sup> The Proposed Project is located at the northwest corner of State Street and Tennessee Street on an approximately 10.98-acre site.<sup>2</sup> The Proposed Project would involve about 10% of warehouse operations for cold storage.<sup>3</sup> According to the Traffic Section of the MND, the Proposed Project would generate 238 daily truck trips for the warehousing portion and 43 daily truck trips for the cold storage portion.<sup>4</sup> Based on the Site Plan drawing, the Proposed Project would have 25 loading docks<sup>5</sup> associated with the warehouse operation. Trucks access the Proposed Project site via driveways on Kansas Street and Tennessee Street (primary access), and State Street (secondary access).<sup>6</sup> Based on the aerial photographs, South Coast AQMD staff finds that the nearest sensitive receptors are within 265 feet southeast (Kindergarten & Kids Care), 350 feet south (Redlands Christian Middle School), and about 760 feet southeast (apartments) of the Proposed Project site. The tentative construction schedule of the Proposed Project is estimated to begin in June 2023 and end in May 2024.<sup>7</sup>

A-2

<sup>1</sup> MND. Pages 3 and 4.

<sup>2</sup> *Ibid.* Page 3.

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

<sup>4</sup> *Ibid.* Page 78.

<sup>5</sup> *Ibid.* Page 12.

<sup>6</sup> *Ibid.* Page 4.

<sup>7</sup> *Ibid.* Page 23.

South Coast AQMD Staff’s Comments on the MND

*Localized Construction and Operation Impacts Analysis*

Under Section 4.3 - Air Quality in the MND, the Lead Agency only discusses the regional construction and operation impacts but not the localized impacts of the Proposed Project. However, the localized impacts analysis is only included in Appendix A: Air Quality, Greenhouse Gases, Energy Report, and Health Risk Assessment.<sup>8</sup> Therefore, South Coast AQMD staff recommends that the Lead Agency revise to include the localized construction and operation impacts analysis in the Final MND so that the analysis is consistently discussed throughout the MND and its appendices.

A-3

*CEQA Regional Air Quality Impacts Analysis for Cleanup Activities During Construction*

Based on the Hazards and Hazardous Materials Section in the MND and Appendix C: Phase I Environmental Site Assessment,<sup>9</sup> hazardous substances are likely to present at the property, such as soil impacted by VOCs and total petroleum hydrocarbon (TPH)<sup>10</sup>. Furthermore, the Limited Phase II Site Investigation has identified VOC contamination at the northern portion of the Proposed Project site, and VOC concentrations have slightly impacted the groundwater.<sup>11</sup> It is recommended that soil vapor extraction (SVE) be implemented to remediate soil at the Proposed Project site.<sup>12</sup> Hence, the Lead Agency discusses the Mitigation Measures (MM) HAZ-2 through MM HAZ-4 for the remediation and monitoring activities.<sup>13</sup> However, the MND contains no analysis of the air quality impacts that quantifies the emissions associated with the remediation activities during construction.

A-4

Cleanup activities will likely involve using heavy-duty, diesel-fueled trucks for soil export, resulting in emissions from truck hauling activities and vehicle trips by workers that will be required to conduct cleanup activities. Additionally, cleanup activities will likely require the use of additional equipment that may differ from typical equipment for grading and site preparation for construction. Because cleanup activities are reasonably foreseeable, the Lead Agency should use good faith and best efforts to provide information on the scope, types, and duration of cleanup activities, quantify emissions from cleanup activities, and include those emissions in the Proposed Project’s construction emissions profile to be compared to South Coast AQMD’s air quality CEQA significance thresholds for construction to determine the level of significance in the Final MND. Alternatively, if emissions from cleanup activities are not included in the Final MND, the Lead Agency should include a new air quality mitigation measure in the Air Quality Section of the Final MND to commit to evaluating the potential environmental impacts from cleanup activities through CEQA prior to commencing any cleanup activities. If a new air quality mitigation measure is not included in the Final MND, the Lead Agency should provide reasons supported by substantial evidence in the record to explain why a new air quality mitigation measure is not included.

<sup>8</sup> *Ibid.* Appendix A: Air Quality, Greenhouse Gases, Energy Report, and Health Risk Assessment. Pages 57 and 58.

<sup>9</sup> *Ibid.* Appendix C: Phase I Environmental Site Assessment.

<sup>10</sup> *Ibid.* Page 53.

<sup>11</sup> *Ibid.* Page 54.

<sup>12</sup> *Ibid.*

<sup>13</sup> *Ibid.* Page 55

In addition, the hazardous landfill that accepted contaminated soils is not identified in the MND. The Lead Agency should identify the hazardous landfill for the contaminated soil and estimate the distance (e.g., one-way truck trip length) from the Proposed Project site. When quantifying emissions from transportation and off-site disposal, the Proposed Project's construction emissions from haul truck trips for transporting and disposing of contaminated soil should be calculated based on the appropriate one-way truck trip length. Therefore, South Coast AQMD staff recommends that the Lead Agency estimate the amount of contaminated soil that would be removed, calculate the construction emissions reflecting the correct number of hauling truck trips and the hauling trip lengths in CalEEMod and include them in the Final MND. If the number of hauling truck trips and the one-way truck trip lengths are not calculated for quantifying emissions from haul truck trips for transporting contaminated soil, the Lead Agency should provide reasons for not re-calculating it supported by substantial evidence in the record.

A-5

#### *Recommended Revision to the Construction Mitigation Measures*

Under Section 4.3 - Air Quality in the MND, the unmitigated health risks from the Proposed Project's construction resulted in significant<sup>14</sup> as the cancer risks exceed South Coast AQMD Air Quality Significance Thresholds.<sup>15</sup> Hence, the Lead Agency proposes the implementation of MM AIR-1 to "ensure all off-road diesel-powered construction equipment of 50 horsepower or more used for the project is equipped with Level 3 diesel particulate filters or equivalent."<sup>16</sup> In addition, the California Emission Estimator Model (CalEEMod) analysis in Appendix A assumes the use of Tier 2 construction equipment<sup>17</sup> during the construction period. Although the implementation of MM AIR-1 would reduce the cancer risks from Proposed Project's construction activities below the South Coast AQMD Air Quality Significance Thresholds, South Coast AQMD staff recommends that the Lead Agency take a further step and consider the use of cleaner and better technologies (e.g., Tier 4F construction equipment) with the diesel particulate filters, if and where feasible, to further reduce or minimize the impacts of the Proposed Project's construction activities to the sensitive receptors and off-site workers. The Lead Agency is encouraged to revise the MM to use cleaner technologies during construction and includes the revision in the Final MND. If the revised MM is not included in the Final MND, the Lead Agency should provide reasons for not having them supported by substantial evidence in the record.

A-6

#### *Additional Recommended Air Quality Mitigation Measures*

In the event that the Proposed Project results in significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize these impacts. Any impacts resulting from mitigation measures must also be analyzed. Several resources to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project include South Coast AQMD's CEQA Air Quality Handbook,<sup>18</sup> South Coast

<sup>14</sup> *Ibid.* Page 27.

<sup>15</sup> South Coast AQMD Air Quality Significance Thresholds. Access at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf>

<sup>16</sup> *Ibid.* Page 29.

<sup>17</sup> *Ibid.* Appendix A. Page 44.

<sup>18</sup> South Coast AQMD's CEQA Air Quality Handbook. Access at: <https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>

A-7

AQMD’s Mitigation Monitoring and Reporting Plan for the 2022 Air Quality Management Plan,<sup>19</sup> and Southern California Association of Government’s Mitigation Monitoring and Reporting Plan for the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy.<sup>20</sup>

Mitigation measures for operational air quality impacts from mobile sources that the Lead Agency should consider in the Final MND may include the following:

- Require zero-emissions (ZE) or near-zero emission (NZE) on-road haul trucks, such as heavy-duty trucks with natural gas engines that meet the CARB’s adopted optional NOx emissions standard at 0.02 grams per brake horsepower-hour (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>21</sup> and the Heavy-Duty Low NOx Omnibus Regulation<sup>22</sup>, ZE and NZE trucks will become increasingly more available to use. The Lead Agency should require a phase-in schedule to incentivize using 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 with the Lead Agency. At a minimum, require the use of the 2010 model year<sup>23</sup> that meets CARB’s 2010 engine emissions standards at 0.01 g/bhp-hr of particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks. Where appropriate, include environmental analyses to evaluate and identify sufficient electricity and supportive infrastructures in the Energy and Utilities and Service Systems Sections in the CEQA document. Include the requirement in applicable bid documents, purchase orders, and contracts. Operators 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 to the maximum extent feasible to ensure compliance.
- Limit the daily number of trucks allowed at the Proposed Project to levels analyzed in the Final CEQA document. If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the Proposed Project through CEQA prior to allowing this higher activity level.
- Provide electric vehicle (EV) charging stations or, at a minimum, provide the electrical infrastructure, and electrical panels should be appropriately sized. Electrical hookups should be provided for truckers to plug in any onboard auxiliary equipment.

A-8

A-9

A-10

<sup>19</sup> South Coast AQMD’s 2022 Air Quality Management Plan can be found at: <http://www.aqmd.gov/home/air-quality/cleanair-plans/air-quality-mgt-plan> (Chapter 4 - Control Strategy and Implementation)

<sup>20</sup> Southern California Association of Governments’ 2020-2045 RTP/SCS can be found at:

[https://www.connectsocial.org/Documents/PMND/certified/Exhibit-A\\_ConnectSoCal\\_PMND.pdf](https://www.connectsocial.org/Documents/PMND/certified/Exhibit-A_ConnectSoCal_PMND.pdf)

<sup>21</sup> CARB. June 25, 2020. *Advanced Clean Trucks Rule*. Accessed at: <https://ww2.arb.ca.gov/our-work/programs/advanced-clean-trucks>.

<sup>22</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>23</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>.

Mitigation measures for operational air quality impacts from other area sources that the Lead Agency should consider in the Final MND may include the following:

- Maximize the use of solar energy by installing solar energy arrays
- Use light-colored paving and roofing materials
- Utilize only Energy Star heating, cooling, and lighting devices, and appliances
- Use of water-based or low-VOC cleaning products that go beyond the requirements of South Coast AQMD Rule 1113

A-11

Furthermore, the Final MND needs to clarify the routes designated for trucks associated with the Proposed Project development. Thus, design considerations for the Proposed Project that the Lead Agency should consider included in the Final MND 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, daycare centers, etc.)
- Design the Proposed Project 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 Proposed Project site
- Design the Proposed Project such that any check-in point for trucks is inside the Proposed Project site to ensure that no trucks are queuing outside
- Design the Proposed Project to ensure that truck traffic inside the Proposed 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 Proposed Project site

A-12

South Coast AQMD staff also suggests the Lead Agency review the references (listed below) and consider including the additional recommended mitigation measures in the Final MND:

- State of California – Department of Justice: Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act<sup>24</sup>
- South Coast AQMD 2022 South Coast Air Quality Management Plan,<sup>25</sup> specifically:
  - Appendix IV-A – South Coast AQMD’s Stationary and Mobile Sources Control Measures
  - Appendix IV-B – CARB’s Strategy for South Coast
  - Appendix IV-C – SCAG’s Regional Transportation Strategy and Control Measures
- United States Environmental Protection Agency (U.S. EPA): Mobile Source Pollution - Environmental Justice and Transportation<sup>26</sup>

A-13

<sup>24</sup> State of California – Department of Justice. Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act. Access at: <https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf>

<sup>25</sup> 2022 South Coast AQMP. Access at: <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan>

<sup>26</sup> United States Environmental Protection Agency (U.S. EPA): Mobile Source Pollution - Environmental Justice and Transportation. Access at: <https://www.epa.gov/mobile-source-pollution/environmental-justice-and-transportation>

*South Coast AQMD Rules 2305 and 316*

On May 7, 2021, South Coast AQMD's Governing Board adopted Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program, and Rule 316 – Fees for Rule 2305. Rules 2305 and 316 are new rules that will reduce regional and local emissions of nitrogen oxides (NOx) and particulate matter (PM), including diesel PM (DPM). These emission reductions will reduce public health impacts for communities near warehouses from mobile sources associated with warehouse activities. Also, the emission reductions will help the region attain federal and state ambient air quality standards. Rule 2305 applies to owners and operators of warehouses greater than or equal to 100,000 square feet. Under Rule 2305, operators are subject to an annual WAIRE Points Compliance Obligation calculated based on the annual number of truck trips to the warehouse. WAIRE Points can be earned by implementing actions in a prescribed menu in Rule 2305, implementing a site-specific custom plan, or paying a mitigation fee. Warehouse owners are only required to submit limited information reports, but they can opt-in to earn Points on behalf of the tenants if they choose because certain actions to reduce emissions may be better achieved during the warehouse development phase, for instance, the installation of solar and charging infrastructure. Rule 316 is a companion fee rule for Rule 2305, allowing South Coast AQMD to recover costs associated with Rule 2305 compliance activities. Since the Proposed Project consists of developing warehouses (unrefrigerated and refrigerated) under industrial land use up to a maximum of 197,397 square feet, the Proposed Project's warehouse owners and operators will be required to comply with Rule 2305 once the warehouse is occupied. Therefore, South Coast AQMD staff recommends that the Lead Agency review South Coast AQMD Rule 2305 to determine the potential WAIRE Points Compliance Obligation for future operators and explore whether additional project requirements and CEQA mitigation measures can be identified and implemented at the Proposed Project that may help future warehouse operators meet the compliance obligation.<sup>27</sup> South Coast AQMD staff is available to answer questions concerning Rule 2305 implementation and compliance by phone or email at (909) 396-3140 or [waire-program@aqmd.gov](mailto:waire-program@aqmd.gov). For implementation guidance documents and compliance and reporting tools, please visit South Coast AQMD's WAIRE Program webpage.<sup>28</sup>

A-14

*South Coast AQMD Permits and Responsible Agency*

If implementing the Proposed Project would require new stationary equipment, including but not limited to emergency generators, fire water pumps, boilers, etc., permits from South Coast AQMD are required. The Final MND should include a discussion on stationary equipment requiring South Coast AQMD permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project. Any assumptions used for the stationary sources in the Final MND will also be used as the basis for the permit conditions and limits for the Proposed Project. Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions on permits. For more general information on permits, please visit South Coast AQMD's webpage at: <http://www.aqmd.gov/home/permits>.

A-15

<sup>27</sup> South Coast AQMD Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xxiii/r2305.pdf>.

<sup>28</sup> South Coast AQMD WAIRE Program. Accessed at: <http://www.aqmd.gov/waire>.

Conclusion

Pursuant to California Public Resources Code Section 21092.5(b) CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process. Please provide South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided.

A-16

We appreciate the opportunity to review the Proposed Project. Thank you for considering these comments. 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 Danica Nguyen, Air Quality Specialist, at [dnguyen1@aqmd.gov](mailto:dnguyen1@aqmd.gov) should you have any questions.

Sincerely,

*Sam Wang*

Sam Wang  
Program Supervisor, CEQA-IGR  
Planning, Rule Development & Implementation

SW:DN  
SBC230510-08  
Control Number





## Department of Public Works

- Flood Control
- Operations
- Solid Waste Management
- Special Districts
- Surveyor
- Transportation

[www.SBCounty.gov](http://www.SBCounty.gov)

**Brendon Biggs, M.S., P.E.**  
Director

**Noel Castillo, P.E.**  
Assistant Director

**David Doublet, M.S., P.E.**  
Assistant Director

### Transmitted via E-mail

May 18, 2023

File: 10(ENV)-4.01

City of Redlands  
Attn: Sean Reilly, Principal Planner  
Development Services Department  
P.O. Box 3005,  
Redlands, CA 92373-1505  
[sreilly@cityofredlands.org](mailto:sreilly@cityofredlands.org)

**RE: CEQA – 301 TENNESSEE STREET WAREHOUSE PROJECT FILING OF NOTICE OF INTENT TO ADOPT A MITIGATED NEGATIVE DECLARATION IN COMPLIANCE WITH PUBLIC RESOURCES CODE SECTION 21092.3.**

Dear Mr. Reilly:

Thank you for allowing the San Bernardino County Department of Public Works the opportunity to comment on the above-referenced project. **We received this request on May 05, 2023**, and pursuant to our review, the following comments are provided:

#### **Permits/Operations Support Division (Johnny Gayman, Chief, 909-387-7995):**

1. The proposed Project is located adjacent to a San Bernardino County Flood Control District (SBCFCD) right-of way and/or facilities (3-501-1A) Mission Channel. Any encroachments including, but not limited to access for grading, fence removal and installation, side drain connections, Trail improvements, and utilities crossing on the District's right-of-way or facilities will require a permit from the SBCFCD prior to start of construction. Please contact the San Bernardino County Flood Control Permit Section at (909) 387-7995 for further information regarding this process. If you have any questions regarding this process, please contact the FCD Permit Section at (909) 387-1863.

B-1

#### **Flood Control Planning Division (Michael Fam, PWE III, 909-387-8120):**

1. We are aware there may be storm drains in and around the site that may be affected by the proposed Project. When planning for or altering existing or future storm drains, be advised that the Project is subject to the Redlands Master Plan of Drainage dated, May 2014. It is to be used as a guideline for drainage in the area and is available in the City of Redlands offices. Any revision to the drainage should be reviewed and approved by the jurisdictional agency in which the revision occurs (i.e., City, County).

B-2

We respectfully request to be included on the circulation list for all project notices, public reviews, or public hearings. In closing, I would like to thank you again for allowing the San Bernardino County Department of Public Works the opportunity to comment on the above-referenced project. Should you have any questions or need additional clarification, please contact the individuals who provided the specific comment, as listed above.

Sincerely,

*Nancy Sansonetti*

**Nancy Sansonetti, AICP**  
Supervising Planner  
Environmental Management

NS:AS:kc

**301 Tennessee Street Warehouse Project IS/MND, Response to Public Comments**

Comment Number	Comment Responses
<i>LETTER A</i>	<b>South Coast Air Quality Management District (SCAQMD)</b>
A-1	This comment provides introductory remarks. No responses are needed
A-2	This comment includes information from the IS/MND project description. It also indicates that the SCAQMD asserts, based on a review of aerial photographs that the nearest sensitive receptors to the project site, Redlands Adventist Academy Kindergarten and Kids Care are 265 feet from the project while the air quality report prepared for the project by LSA indicates that the distance is 275 feet. As referenced in the attached memo (see Attachment 2), LSA reviewed the distance and verified that it is 275 feet. No additional response is needed and no modification to the IS/MND is warranted.
A-3	<p>This comments notes that, while the air quality/greenhouse gas analysis prepared for the IS/MND included an analysis of localized construction and operational impacts, the analysis was not carried forward into the body of the Initial Study. We concur with the SCAQMD's recommendation to include this part of the analysis in the final adopted MND. Recommended language changes to the MND are included in Attachment 1 of this memorandum.</p> <p>It should be noted that the modified language is provided for purposes of clarification and does not change the conclusions of the MND, and potential impacts to sensitive receptors remains less than significant.</p>
A-4	<p>The SCAQMD asserts that Mitigation Measures HAZ-2 through HAZ-4 in the Draft IS/MND require implementation of on-site soil vapor extraction (SVE) remediation activities and that the Draft IS/MND contains no analysis of the air quality impacts that quantifies the emissions associated with the remediation activities during construction. In addition, the SCAQMD asserts that cleanup activities will likely involve using heavy-duty, diesel-fueled trucks for soil export, resulting in emissions from truck hauling activities and vehicle trips by workers that will be required to conduct cleanup activities. Additionally, the SCAQMD states that cleanup activities will likely require the use of additional equipment that may differ from typical equipment for grading and site preparation for construction, which should be evaluated in the Final IS/MND. The crux of the SCAQMD's comment is how the SVE system currently in place on the site works and if it emits any atmospheric VOCs that may be of concern to SCAQMD.</p> <p>The existing SVE system was processed through and is permitted by the SCAQMD (Permit #F63440 ID 125390) and extracts soil vapor from the subsurface via SVE wells and an extraction blower. The extracted soil vapor is then directed through two carbon adsorption vessels which contain 2,000 pounds of granular activated carbon (GAC). The GAC absorbs and removes any potential volatile organic compounds (VOCs) from the air, which is then emitted from an exhaust stack that is 13 feet above the ground surface. The applicant's consultant, Roux, performs weekly checks and monthly laboratory analysis to confirm that the effluent air being emitted does not contain VOCs beyond the allowable limits of the SCAQMD permit. To date, there have been no exceedances in the emitted soil vapor.</p> <p>As identified on page 57 of the Draft IS/MND, onsite SVE remediation activities began in September 2022 and were ongoing during preparation of the IS/MND and the public circulation period. Further, the attached memorandum (see Attachment 3) from Roux Associates entitled "Response to Earthwork Related Public Comments Related to Environmental IS/MND, 301 Tennessee Street and 360 Kansas Street, Redlands, California" confirms that soil remediation and soil vapor using SVE technology began at the project site in September 2022 and are currently on-going. Therefore, it is not expected that any contaminated soils will be encountered or exported. As such, the Draft IS/MND and LSA's report accurately evaluated construction-related emissions so no changes to the Draft IS/MND or LSA's report are required or proposed. This information merely expands or clarifies information already in the IS/MND and its technical studies.</p>

Comment Number	Comment Responses
A-5	<p>In this comment the SCAQMD asked how much contaminated soil or water has already been removed from the site and where it was disposed which might result in additional air pollutant emissions from truck trips that were not anticipated in the IS/MND and the air quality study.</p> <p>To date, there has not been any contaminated soil or water removed from the project site. Soil removed during drilling and trenching associated with remediation activities was analyzed and profiled as non-hazardous before being disposed of at Soil Safe in Adelanto, California. A total of 9.1 tons of non-hazardous materials were disposed of but this soil is not associated with grading of the Project site for development purposes and was removed consistent with SCAQMD Permit #F63440 . As stated by the hazardous materials environmental consultant Roux Associates, they do not anticipate the need for removal of any contaminated soil materials during or after removal of the SVE unit.</p> <p>Regarding actual grading for the proposed development, page 4 of the Draft IS/MND explains that, based on the preliminary grading plans, the project would require approximately 23,154 cubic yards of soil import. As discussed on page 45 of LSA's Air Quality/GHG report, the project's estimated soil import was included in the California Emissions Estimator Model (CalEEMod) modeling for the project. As such, haul trucks and construction equipment associated with soil import activities were included in CalEEMod. Based on CalEEMod default assumptions and soil import activities, grading would require the use of two excavators, one grader, one rubber-tired dozer, two scrapers, and two tractors/loaders/backhoes. In addition, CalEEMod estimated that there would be approximately 3,060 haul trips associated with the soil import.</p> <p>All of the construction emissions were adequately addressed in LSA's Air Quality/GHG report and the IS/MND. In addition, all of the ongoing soil removal associated with remediation activities have been undertaken consistent with SCAQMD (Permit #F63440 ID 125390 (See discussion under response A-4, above).</p>
A-6	<p>This comment recommends that, although the implementation of Mitigation Measure MM AIR-1 would reduce the cancer risks from the proposed project's construction activities below the SCAQMD Air Quality Significance Thresholds, MM AIR-1 be revised to require Tier 4F construction equipment. Since, as the comment notes, the SCAQMD thresholds are not exceeded with MM AIR -1 in its current form, more stringent requirements are not warranted or necessary.</p> <p>A construction Health Risk Assessment (HRA), which evaluates construction-period health risk to off-site receptors, was performed for the proposed project as part of the LSA air quality report. The results of the construction HRA are presented on pages 27 and 28 of the Draft IS/MND and pages 63 and 64 of the report. Based on the results of the construction HRA, with implementation of Mitigation Measure AIR-1, which requires the use of Tier 2 construction equipment equipped with Level 3 diesel particulate filters, construction of the proposed project would not exceed SCAQMD thresholds and would not expose nearby sensitive receptors to substantial pollutant concentrations. As impacts would be less than significant with the implementation of Mitigation Measure AIR-1, identification and analysis of additional mitigation, such as Tier 4FI construction equipment is not warranted and would represent requirements that are disproportionate compared to potential project impacts. Therefore, pursuant to CEQA Guidelines Section 15126.4 (a)(4)(A)–(B), there is no nexus between mitigation requiring Tier 4 construction equipment and the project's air quality and health risk impacts.</p>
A-7	<p>This comment identifies the need for additional mitigation measures if the proposed project has significant adverse impacts: the project does not have such impacts and, therefore additional mitigation measures are not warranted or necessary and would be disproportionate compared to potential project impacts.</p>

Comment Number	Comment Responses
A-8	This comment asks for consideration of requirements for zero-emissions (ZE) or near-zero emission (NZE) on-road haul trucks. Since impacts with respect to the construction and operation of the project would be less than significant with application of Mitigation Measure MM Air-1, additional mitigation measures are not warranted or necessary and would be disproportionate compared to potential project impacts.
A-9	<p>This comment recommends considering limiting the daily number of trucks allowed at the proposed project to levels analyzed in the IS/MND.</p> <p>As demonstrated on pages 25 and 26 of the Draft IS/MND and pages 60 and 61 of LSA's report, long-term operational emissions, including estimated truck trips, associated with the proposed project were calculated using the CalEEMod and based on widely accepted industry standards. The results shown in Table 5 of the Draft IS/MND indicate that operation of the proposed project would not exceed the SCAQMD's significance criteria and would result in a less than significant impact on regional air quality. It should also be pointed out that total estimated operational emissions generated from the project are already well below SCAQMD emissions thresholds.</p>
A-10	<p>This comment recommends providing electric vehicle (EV) charging stations or, at a minimum, providing electrical infrastructure.</p> <p>Since impacts with respect to the construction and operation of the project would be less than significant with application of Mitigation Measure MM Air-1, additional mitigation measures are not warranted or necessary and would be disproportionate compared to potential project impacts.</p>
A-11	This comment includes several recommendations related to active and passive solar mitigation measures and other energy efficiency measures for operational air quality impacts. Since operational impacts would be less than significant, additional mitigation measures are not warranted or necessary and would be disproportionate compared to potential project impacts.
A-12	This comment recommends a variety of measure related to trucks and truck routes. Since operational impacts would be less than significant, additional mitigation measures are not warranted or necessary and would be disproportionate compared to potential project impacts. It should also be noted that the City has officially designated truck routes which include Tennessee Street and West State Street which both are adjacent to the project site.
A-13	This comment suggests that the City, as the Lead Agency, review several identified reference sources and consider including additional mitigation measures in the Final MND. Since operational impacts would be less than significant, additional mitigation measures are not warranted or necessary and would be disproportionate compared to potential project impacts.
A-14	This comments states that the proposed project's warehouse owners and future operators would be required to comply with SCAQMD's Rule 2305 and Rule 316 once the warehouse is occupied. The City of Redlands acknowledges that the proposed project's future owners and operators would be required to comply with SCAQMD's Rule 2305 and Rule 316 and all other applicable air quality regulations. Given the speculative nature of the proposed project (a tenant has not yet been identified) and the fact that compliance with Rules 2305 and Rule 316 can be attained through a variety of emission reduction strategies that are selected by an individual warehouse operator, no changes to the Draft IS/MND is warranted.
A-15	This comment states that, if the proposed project needs stationary equipment such, equipment may be subject to permits from the SCAQMD are required and recommends a discussion of such future equipment in the IS/MND. At this time, a specific tenant has not yet been identified for the proposed project. Therefore, it is not possible to determine which on-site equipment would be used on the project site and whether permits from SCAQMD would be required. Nevertheless, the Draft IS/MND presents a conservative analysis of the proposed project's air quality emissions based on available information. No further response is necessary.

<b>Comment Number</b>	<b>Comment Responses</b>
A-16	<p>This comment is the conclusion of the letter. It references the State CEQA Guidelines section that requires the Lead Agency (the City in this case to consider any comments received during the public review process on an IS/MND. It also requests that a copy of written responses to the SCAQMD comment letter be provided to them prior to the adoption of the IS/MND. The City will provide responses to the comments and also notify the SCAQMD of the date, time, and place of the Planning Commission hearing to be held for this project.</p> <p>No further response is needed for this comment since no issues related to the adequacy of the IS/MND were raised.</p>
<i>LETTER B</i>	<b>San Bernardino County Department of Public Works</b>
B-1	<p>This comment notes that the Project is located adjacent to the Mission Channel a San Bernardino County Flood Control District(SBCFCD) facility and notes that any encroachments on the facility or its right-of-way require a permit from the SBCFCD. The City acknowledges this comment but, since it is not directed at the IS/MND, no additional response is needed.</p>
B-2	<p>This comment states that the project is subject to the Redlands Master Plan of Drainage dated, May 2014. This comment is noted. No further response is needed</p>
B-4	<p>This comment request that the Department of Public Works be included on the circulation list for all project notices, public reviews, or public hearings, and thanks the City allowing the San Bernardino County Department of Public Works the opportunity to comment on the project.</p>

**ATTACHMENT 1**

**Recommended Addition  
to the IS/MND**

**[Behind this page]**

# Attachment 1

## Recommended Addition to Air Quality Section

In response to SCAQMD Comment Number A-3, the following text is recommended to be added to Section 4.3 – C of the IS/MND (starting on page 26) related to sensitive receptors

**c) Less than Significant Impact with Mitigation Incorporated.**

Localized Significance Analysis

Project construction and operation emissions were compared to SCAQMD Local Significance Thresholds (LST) based on an 84-meter source-receptor distance and a disturbed acreage of 3.5 acres. By design, the localized impacts analysis only includes on-site sources; however, the CalEEMod outputs do not separate on-site and off-site emissions for mobile sources. For a worst-case scenario assessment, the emissions detailed in Table 7 assume all area source emissions would occur on site, all of the energy source emissions would occur off site at the utility power stations, and 5 percent of the project-related new mobile sources, which is an estimate of the amount of project-related on-site vehicle travel, would occur on site. Considering the total trip length included in CalEEMod, the 5 percent assumption is conservative.

The results of the LST analysis, summarized in Table 6 and Table 7, indicate that the project would not result in an exceedance of the SCAQMD LSTs during project construction or operation.

**Table 6**  
**Project Localized Construction Emissions (Lbs./Day)**

Source	NO <sub>x</sub>	CO	PM <sub>10</sub>	PM <sub>2.5</sub>
On-Site Project Emissions	51.2	36.7	9.8	5.5
Localized Significance Threshold	298.3	3,386.3	47.5	14.0
<b>Exceeds Threshold?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
Source: Compiled by LSA (January 2023). Note: Source Receptor Area 35, based on a 3.5-acre construction disturbance daily area, at a distance of 84 meters from the project boundary  CO= carbon monoxide lbs/day = pounds per day <span style="float: right;">PM<sub>2.5</sub>= particulate matter less than 2.5 microns in size            PM<sub>10</sub>= particulate matter less than 10 microns in size</span>				

**Table 7**  
**Project Localized Operational Emissions (Lbs./Day)**

Source	NO <sub>x</sub>	CO	PM <sub>10</sub>	PM <sub>2.5</sub>
On-Site Project Emissions	1.9	1.5	0.7	0.2
Localized Significance Threshold	298.3	3,386.3	12.0	3.9
<b>Exceeds Threshold?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
Source: Compiled by LSA (January 2023). Note: Source Receptor Area 35, based on a 3.5-acre construction disturbance daily area, at a distance of 84 meters from the project boundary  CO= carbon monoxide lbs/day = pounds per day NO <sub>x</sub> = nitrogen oxides <span style="float: right;">PM<sub>2.5</sub>= particulate matter less than 2.5 microns in size            PM<sub>10</sub>= particulate matter less than 10 microns in size</span>				



**ATTACHMENT 2**

**LSA Memo:  
Response to SCAQMD  
Staff Comments,  
July 7 2023**

**[Behind this page]**



## MEMORANDUM

**DATE:** July 7, 2023  
**To:** Heather Roberts and Norah Jaffan, EPD Solutions  
**FROM:** Cara Cunningham, Associate  
**SUBJECT:** Response to SCAQMD Staff Comments

LSA has reviewed comments from Program Supervisor, Sam Wang of the South Coast Air Quality Management District (SCAQMD) on the Draft Initial Study/Mitigated Negative Declaration (IS/MND) for the Proposed 301 Tennessee Street Warehouse Project prepared by the City of Redlands and MIG, Inc. dated May 1, 2023. LSA prepared the Air Quality, Health Risk, Greenhouse Gas, and Energy Impact Report (report) for the proposed project dated February 2023 (Appendix A of the Draft IS/MND). The findings from the report were used as the basis for the findings in the Draft IS/MND.

### SCAQMD STAFF'S SUMMARY OF PROJECT INFORMATION

The SCAQMD provided a summary of project-related information contained in the Draft IS/MND, including a brief project description and distance to the nearest sensitive receptors. The SCAQMD states that the nearest sensitive receptors are within 265 feet southeast (Kindergarten & Kids Care), 350 feet south (Redlands Christian Middle School), and about 760 feet southeast (apartments) of the project site.

The report identifies the nearest sensitive receptors on page 4. As identified in the report, the closest sensitive receptor to the project site is Redlands Adventist Academy Kindergarten and Kids Care, located approximately 275 feet southeast of the project site southern boundary opposite West State Street. Other sensitive receptors include Redlands Christian Middle School, located approximately 380 feet from the project site, and Arrowhead Christian Academy Upper School, located approximately 715 feet south of the project site, Redlands Adventist Academy located approximately 780 feet southeast of the project site, single-family residential uses located approximately 800 feet northeast of the project site, and Redlands Apartments located approximately 900 feet southeast from the project site southern boundary.

LSA has confirmed that the distance to the nearest sensitive receptor is approximately 275 feet. In addition, as discussed on pages 48 through 51 of the report, a construction health risk assessment (HRA) using air dispersion modeling was performed using AERMOD, which is approved by the United States Environmental Protection Agency (USEPA) when estimating the air quality impacts associated with point and fugitive sources in simple and complex terrain. The model was used to calculate the annual average pollutant concentrations associated with each emitting source. As shown in Figure 4

of the report, receptors were placed at the nearest sensitive receptor locations within the model. As such, the report correctly identified and evaluated impacts to the nearest sensitive receptors. No changes to the Draft IS/MND or report are warranted.

### **LOCALIZED CONSTRUCTION AND OPERATION IMPACTS ANALYSIS**

The SCAQMD recommends that the Final IS/MND include the localized construction and operation impacts analysis.

As demonstrated on pages 61 and 62 of the report, project construction and operational emissions were compared to the localized significance thresholds (LST) screening tables in the East San Bernardino Valley area (SRA 35) based on the distance to the nearest receptors. The results of the LST analysis, summarized in Table N and Table O of the report, indicate that the project would not result in an exceedance of the SCAQMD LSTs during project construction or operation.

### **AIR QUALITY IMPACTS ANALYSIS FOR CLEANUP ACTIVITIES DURING CONSTRUCTION**

The SCAQMD asserts that Mitigation Measures HAZ-2 through HAZ-4 in the Draft IS/MND require implementation of on-site soil vapor extraction (SVE) remediation activities and that the Draft IS/MND contains no analysis of the air quality impacts that quantifies the emissions associated with the remediation activities during construction. In addition, the SCAQMD asserts that cleanup activities will likely involve using heavy-duty, diesel-fueled trucks for soil export, resulting in emissions from truck hauling activities and vehicle trips by workers that will be required to conduct cleanup activities. Additionally, the SCAQMD states that cleanup activities will likely require the use of additional equipment that may differ from typical equipment for grading and site preparation for construction, which should be evaluated in the Final IS/MND.

As discussed on page 4 of the Draft IS/MND, based on the preliminary grading plans, the project would require approximately 23,154 cubic yards of soil import. As discussed on page 45 of the report, the project's estimated soil import was included in the California Emissions Estimator Model (CalEEMod) modeling for the project. As such, haul trucks and construction equipment associated with soil import activities were included in CalEEMod. Based on CalEEMod default assumptions and soil import activities, grading would require the use of two excavators, one grader, one rubber tired dozer, two scrapers, and two tractors/loaders/backhoes. In addition, CalEEMod estimated that there would be approximately 3,060 haul trips associated with the soil import.

As identified on page 57 of the Draft IS/MND, onsite SVE remediation activities began in September 2022 and were ongoing during preparation of the CEQA document. Further, the Response to Earthwork Related Public Comments Related to Environmental IS/MND letter<sup>1</sup> confirms that soil remediation and soil vapor using SVE technology began at the project site in September 2022 and are currently on-going. Therefore, it is not expected that any contaminated soils will be encountered

---

<sup>1</sup> Roux Associates, Inc. 2023. *Response to Earthwork Related Public Comments Related to Environmental IS/MND, 301 Tennessee Street and 360 Kansas Street, Redlands, California*. June 19.

or exported. As such, the Draft IS/MND and report accurately evaluated construction-related emissions. No changes to the Draft IS/MND or report are warranted.

### **RECOMMENDED REVISION TO THE CONSTRUCTION MITIGATION MEASURES**

The SCAQMD recommends that the City require the use of Tier 4 final construction equipment with the use of diesel particulate filters to further reduce or minimize the impacts of the project's construction activities to the sensitive receptors and off-site workers.

A construction HRA, which evaluates construction-period health risk to off-site receptors, was performed for the proposed project. The results of the construction HRA are presented on pages 27 and 28 of the Draft IS/MND and pages 63 and 64 of the report. Based on the results of the construction HRA, with implementation of Mitigation Measure AIR-1, which requires the use of Tier 2 construction equipment equipped with Level 3 diesel particulate filters, construction of the proposed project would not exceed SCAQMD thresholds and would not expose nearby sensitive receptors to substantial pollutant concentrations. As impacts would be less than significant with the implementation of Mitigation Measure AIR-1, identification and analysis of additional mitigation, such as Tier 4 final construction equipment, is not required.

### **ADDITIONAL RECOMMENDED AIR QUALITY MITIGATION MEASURES**

The SCAQMD includes a number of suggested mitigation measures to consider in order to reduce impacts related to operational air quality and health risk.

As demonstrated on pages 25 and 26 of the Draft IS/MND and pages 60 and 61 of the report, long-term operational emissions associated with the proposed project were calculated using the CalEEMod. The results shown in Table 5 of the Draft IS/MND and Table M of the report indicate that operation of the proposed project would not exceed the SCAQMD's significance criteria and would result in a less than significant impact on regional air quality. As such, identification and analysis of mitigation measures suggested in the comment letter is not required.

### **SCAQMD RULES 2305 AND 316**

The SCAQMD states that the proposed project's warehouse owners and future operators would be required to comply with SCAQMD's Rule 2305 and Rule 316 once the warehouse is occupied. The City of Redlands acknowledges that the proposed project's future owners and operators would be required to comply with SCAQMD's Rule 2305 and Rule 316 and all other applicable air quality regulations. Given the speculative nature of the proposed project (a tenant has not yet been identified) and the fact that compliance with Rules 2305 and Rule 316 can be attained through a variety of emission reduction strategies that are selected by an individual warehouse operator, no changes to the Draft IS/MND or report are warranted.

### SCAQMD PERMITS AND RESPONSIBLE AGENCY

The SCAQMD serves as a Responsible Agency under CEQA if the implementation of the proposed project requires permits from the agency related to the use of new stationary equipment. The comment also provides concluding remarks and agency contact information. The City of Redlands thanks the SCAQMD for its participation in the CEQA review process for the Goodman Commerce Center Project. At this time, a specific tenant has not yet been identified for the proposed project. Therefore, it is not possible to determine which on-site equipment would be used on the project site and whether permits from SCAQMD would be required. Nevertheless, the Draft IS/MND and report present a conservative analysis of the proposed project's air quality emissions based on available information. No further response is necessary.

This concludes our response to comments. Please contact Cara Cunningham at [cara.cunningham@lsa.net](mailto:cara.cunningham@lsa.net) if you have any additional questions.

**ATTACHMENT 3**

**Roux Associates  
Clarification Memo,  
July 19, 2023**

**[Behind this page]**

June 19, 2023

Mr. Bob Prasse  
MIG, Inc. – Director of Environmental Services  
1650 Spruce Street, Suite 106  
Riverside, California 92507

Re: Response to Earthwork Related Public Comments Related to Environmental IS/MND, 301 Tennessee Street and 360 Kansas Street, Redlands, California

Dear Mr. Prasse,

Roux Associates, Inc. (Roux), on behalf of Duke Realty Tennessee Street, LP, an entity of Prologis, Inc (Owner), has prepared this letter in response to public comments received by the City of Redlands during public circulation of an environmental Initial Study/Mitigated Negative Declaration (IS/MND) for the approximately 11-acre property located at 301 Tennessee Street and 360 Kansas Street, Redlands, California (Site). As relayed by Ms. Heather Duarte of EPD Solutions, Inc. (EPD) on June 12, 2023, clarification has been requested for future redevelopment-related earthwork at the Site. Specifically, questions have been raised as to whether contaminated soils are expected to be encountered during excavation and grading necessary for demolition of an existing 181,500 square foot warehouse building and two ancillary buildings, and/or during grading and construction of a 197,397 square foot light industrial warehouse building.

As previously relayed, remediation of volatile organic compounds (VOCs) in soil and soil vapor using soil vapor extraction (SVE) technology began at the Site in September 2022 and are currently on-going. Roux initially installed two deep extraction wells, SVE-1 and SVE-2, on the northern and western portions of the Site, outside the warehouse building. In May 2023, an additional deep extraction well, SVE-3, was installed at the central portion of the Site. To date, the SVE system has operated for 220 days. Based on influent concentrations and ongoing soil vapor monitoring, it is anticipated that SVE remediation will be completed by July or August 2023. Additional details on the SVE system can be found in Roux's *SVE Pilot Test Technical Memorandum* dated January 4, 2023<sup>1</sup> and the *Soil Vapor Extraction System Construction Completion Report* dated April 18, 2023<sup>2</sup>.

Once the SVE system is shut down, confirmation soil and soil vapor samples will be collected to document that VOC contamination has been treated to the extent practicable, and to show that remaining concentrations in shallow soil, if any, are below thresholds that are protective of human health and the environment. Although unexpected, if soil concentrations show that additional remediation is necessary, SVE activities may resume and additional confirmation samples collected. Therefore, it is not expected that any contaminated soils will be encountered or exported during future earthwork activities.

Should you have any questions regarding this response letter, please contact Justin Allen at (714) 904-4867 or by email at [jallen@rouxinc.com](mailto:jallen@rouxinc.com) or Mauricio H. Escobar at (310) 879-4920 or by email at [mescobar@rouxinc.com](mailto:mescobar@rouxinc.com) with questions or comments.

---

<sup>1</sup> Roux, SVE Technical Memorandum – 301 Tennessee Street, Redlands, California, January 4, 2023.

<sup>2</sup> Roux, SVE System Construction Completion Report – 301 Tennessee Street, Redlands, California, April 18, 2023.

Mr. Bob Prasse  
June 19, 2023  
Page 2

Sincerely,

**ROUX ASSOCIATES, INC.**



Justin Allen  
Project Scientist



Mauricio H. Escobar, P.G.  
Principal Geologist / Vice President