



South Coast Air Quality Management District

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June 17, 2005

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Draft Environmental Impact Report for the Proposed Specific Plan No. 341
(Majestic Freeway Business Center)

The South Coast Air Quality Management District (SCAQMD) 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 Environmental Impact Report.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final Environmental Impact Report. The SCAQMD staff would be happy 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 these comments.

Sincerely,

Steve Smith, Ph.D.
Program Supervisor, CEQA Section
Planning, Rule Development & Area Sources

Attachment

SS:GM

RVC050506-03
Control Number

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Air Quality Analysis

2012 Emission Factor

1. The HRA is based on four scenarios that use 2012 emission factors. It appears that for Scenarios 1 and 3 (industrial and warehouse only) full build out is 5 years, or by 2010. Up to 2010, Scenarios 2 and 4 are identical to Scenarios 1 and 3. In years 6 and 7, Scenarios 2 and 4 add 459,000 sq feet of retail construction, thus full build out for these scenarios would be ~2012.

In addition to evaluating the project impacts at 2012, the lead agency should also look at the project impacts at 2010. Although there would be less trips in 2010, it is possible that impacts at 2010 may be greater than 2012, since the emission factors would be higher in 2010 than 2012. Therefore, it is recommended that the lead agency analyze impacts occurring in the year 2010 and if they are greater than impacts in the year 2012, an HRA should be prepared for the year 2010.

Overlapping Phases

2. The construction period for the project occurs over 5 (Scenarios 1 and 3) and 7 (Scenarios 2 and 4) years. It is likely that construction and operational emissions will overlap. The Final Specific Plan/EIR should identify the overlapping phases of the project to estimate the peak daily emissions.

CO Hotspots Analysis

3. The traffic volumes presented in the Appendix C of the Air Quality Impact Analysis Majestic Freeway Business Center, December 28, 2004 do not match the traffic volumes presented in the Traffic Impact Study Report (Revised) Majestic Freeway Business Center (CFD 88-8) Specific Plan No. 341, December 27, 2004. Please correct this discrepancy in the Final EIR and remodel the CO hotspots analysis as necessary.

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HRA

4. The HRA estimated risk for the full build out year 2012; however, there was no analysis of risk completed for the interim year 2008. Emission rates decrease as cleaner fuels and engines are required or developed. Therefore, while more truck trips may be generated by the propose projects in year 2012, the emission rates in 2008 will be more than 2012. The Final HRA should analyze the effect of the higher emission rates from proposed project in year 2008 on impacted receptors.
5. Sensitive receptors were represented by 16 discrete receptors in HARP. No description of the sensitive receptors (schools, daycare centers, hospitals, etc.) are provided in the HRA. Receptor placement should follow the SCAQMD Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis (HRA Guidance) dated August 2003, which can be found on the SCAQMD website at http://www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.html. The HRA Guidance states:

“The receptor grid should begin at the facility fence line or transportation right-of-way and extend to an adequate distance from the site to cover the facility’s impact area. The peak annual DPM concentrations should be identified using 100-meter receptor grid. A map showing the emission sources and the receptor grid with actual coordinates used in the modeling should be provided. Discrete receptors should also be located at sensitive receptors (e.g., schools, day-care centers, hospitals, etc.) in the impact area (i.e., the area where impacts are greater than 1 in a million).”

The HRA did not include a receptor grid or a map with all of the sources identified (Figure 2 does not identify specific sources the street segments or idling sources modeled). The discrete receptors are not identified in the HRA, so SCAQMD could not determine whether all sensitive receptors were identified.

The final HRA used to support the CEQA document should follow the HRA Guidance for receptor placement (i.e., include gridded receptors in addition to discrete receptors, a map identifying the emission sources and receptors, include discrete receptors at sensitive receptors.).

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HRA, cont.

6. SCAQMD staff could not determine the emission rates entered into HARP from the data provided. SCAQMD staff could not verify how the roadway emission rates were developed from the emission factors presented in Table 2 of the HRA. The lead agencies consultant provided an Excel file with included more detail than the tables presented in the Appendix of the HRA, but the emissions rates in the files did not directly correlate to Table 2 of the HRA either. The final HRA should detail which emission rates were entered into HARP and how they were developed.
7. SCAQMD HRA Guidance also requests a cancer risk isopleth map showing risk contours of 1, 10, and 25 in a million should be included in the impact assessment. The final HRA should include a cancer risk isopleth map as described above.

Mitigation Measures for Construction Air Quality Impacts

8. In order to reduce public exposure to particulate matter and other air contaminants from the project and to comply with the statewide regulation limiting diesel-fueled commercial motor vehicle idling (see California Air Resources Board website: <http://www.arb.ca.gov/toxics/idling/regtext.htm>), the SCAQMD staff recommends that the lead agency modify the following construction mitigation measure:

Recommended Change:

MM Air 2: Prohibit all vehicles from idling in excess of ~~thirty~~ five minutes, both on-site and off-site.

9. Because the construction air quality impacts from the proposed project are estimated to exceed established daily significance thresholds for volatile organic compounds (VOC), nitrogen oxide (NO_x), and carbon monoxide (CO), the SCAQMD staff recommends that the lead agency consider modifying the following mitigation measures and adding additional mitigation measures to further reduce construction air quality impacts from the project, if applicable and feasible:

VOC

Recommended Addition:

- Use required coatings and solvents with a VOC content lower than required under Rule 1113.

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Mitigation Measures for Construction Air Quality Impacts cont.

VOC

Recommended Additions, cont.:

- Construct/build with materials that do not require painting
- Use pre-painted construction materials.

NO_x and CO

Recommended Additions:

- Configure construction parking to minimize traffic interference.
- Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow.
- Give preferential consideration to contractors who use clean fuel construction equipment; emulsified diesel fuels; construction equipment that uses low sulfur diesel and is equipped with oxidation catalysts, particulate traps, or other retrofit technologies, etc.
- Schedule construction activities that affect traffic flow on the arterial system to off-peak hour to the extent practicable.
- Reroute construction trucks away from congested streets or sensitive receptor areas.
- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site.
- Use electricity from power lines rather than temporary diesel generators.

Mitigation Measures for Operational Air Quality Impacts

10. Because the operational air quality impacts from the proposed project are estimated to exceed established daily significance thresholds for volatile organic compounds (VOC), nitrogen oxide (NO_x), carbon monoxide (CO), and PM10, the SCAQMD recommends that the lead agency consider should consider modifying the mitigation measures listed in Volume I Section 4 on pages IV-84 and IV-85, and adding the following mitigation measures to further reduce operational air quality impacts from the project, if applicable and feasible:

Recommended Changes to Measures:

MM Air 3: Prohibit all diesel trucks from idling in excess of ~~ten~~ five minutes, both on-site and off-site.

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Mitigation Measures for Operational Air Quality Impacts, cont.

MM Air 4: ~~Whenever practical, main truck entries will not be located near existing residences~~ Design the warehouse/distribution center such that entrances and exits are such that trucks are not traversing past neighbors or other sensitive receptors.

MM Air 5: Signage will be installed directing heavy-duty trucks to identified truck routes that avoid residential areas within the vicinity of the project site Place signs at the exits of the warehouse/distribution center that indicate which way to turn and the specific truck route to take to get to the freeway.

MM Air 7: As part of the lease agreements, the proposed project owner shall educate drivers/tenants on alternative clean fuels. Flyers and pamphlets shall also be provided for truck drivers informing truck drivers of the health effects of diesel particulate, to encourage drivers to implement diesel reduction measures, and of the importance of being a good neighbor. The following information could be included:

- Health effects of diesel particulate;
- Minimize idle time;
- Air Resources Board Idling Regulation
- Proper rest stops
- Importance of not parking in residential neighborhoods.

Recommended Additions:

- Re-route truck traffic by adding direct off-ramps for the truck or by restricting truck traffic on certain sensitive routes;
- Improve traffic flow by signal synchronization;
- Use street sweepers that comply with SCAQMD Rules 1186 and 1186.1;
- Pave road and road shoulders;
- Require or provide incentives to use low sulfur diesel fuel with particulate traps;
- Conduct air quality monitoring at sensitive receptors ;
- Alternative fueled off-road equipment;
- Create a buffer zone of at least 300 meters (roughly 1,000 feet), which can be office space, employee parking, greenbelt, etc. between the warehouse/distribution center and sensitive receptors;

- Design the warehouse/distribution center such that entrances and exits are such that trucks are not traversing past neighbors or other sensitive receptors;

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Mitigation Measures for Operational Air Quality Impacts, cont.

Recommended Additions, cont.:

- Design the warehouse/distribution center such that any check-in point for trucks is well inside the facility property to ensure that there are no trucks queuing outside of the facility;
- Require the warehouse/distribution center to clearly define the primary entrance and exit of the warehouse/distribution center;
- Restrict overnight parking in residential areas;
- Enforce truck parking restrictions;
- Establish overnight parking within the warehouse/distribution center where trucks can rest overnight;
- Establish area(s) within the facility for repair needs.
- Require all warehouse/distribution centers to operate the cleanest vehicles available;
- Conduct periodic community meetings inviting neighbors, community groups, and other organizations;
- Consider coordinating an outreach program to educate the public on, and their concerns relating to the potential for cumulative impacts from a new warehouse/distribution center;
- Post signs outside of the facility providing a phone number where neighbors can call if there is a specific issue;
- Provide food options, fueling, truck repair and or convenience store on-site to minimize the need for trucks to traverse through residential neighborhoods.

