



South Coast Air Quality Management District

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Draft Negative Declaration (ND) for the Proposed PA04-0063 (Tentative Parcel Map), PA04-0064 through PA04-0068 (5 plot plans, including a future plot plan), and PA04-0139 through PA04-0142 (4 plot plans)

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. In the initial study for the proposed project, the lead agency disregards the conclusions in the Air Quality Assessment that air quality impacts during both construction and operation are significant. As a result, the proposed project does not qualify for a negative declaration. Instead, an environmental impact report should be prepared for the proposed project and circulated for public review.

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final Negative Declaration. 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

RVC050519-01
Control Number

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Environmental Assessment

1. In the environmental checklist prepared for the proposed project, the lead agency concludes that air quality impacts from the proposed project will not be significant based on the results of the air quality analysis in the attached Air Quality Assessment. The Air Quality Assessment clearly demonstrates that both construction and operation air quality impacts are significant. Further, based on the fact that construction and operation emissions exceed the applicable significance thresholds recommended by the SCAQMD, it is irresponsible of the lead agency's consultant to make a recommendation that the proposed project will not generate unavoidable adverse impacts (page 20) because, "The SCAQMD thresholds are set at an extremely low level,..." There are a number of other problems with the Air Quality Assessment as explained in detail in the following comments.
2. On page 9 of the Air Quality Assessment, the lead agency's consultant states, "For the proposed project, 1,627 pounds per day of PM10 are not significant when compared with the total annual of 416 tons per day of particulate matter currently released in the whole South Coast Air Basin (SCAB)." In *King County Farm Bureau v. City of Hanford* (5th Dist. 1990) 221 Cal.App.3d 692 [270 Cal.Rptr.650], the court specifically stated that this method of characterizing air quality impacts is inappropriate, stating, "[t]he EIR's analysis uses the magnitude of the current ozone problem in the air basin in order to trivialize the project's impact." The above statement from the Air Quality Assessment should be deleted, especially in light of the fact that the document states in the same paragraph, "The PM10 emissions generated by the proposed project are projected to be greater than this threshold [150 pounds per day], and therefore, are considered to be significant."

Air Quality Assessment- Construction Impacts

3. In the Air Quality Assessment, the lead agency states that off-road construction vehicles emissions were estimated using data from the SCAQMD CEQA Air Quality Handbook (Handbook) and lists emission estimates in the construction emissions portion of the worksheets. The lead agency did not include the actual emission factors, load factors, etc., in those calculation worksheets. This information should be included as supporting documentation in the Final ND/EA.

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Air Quality Assessment – Construction Impacts, cont.

4. On page 10 of the Air Quality Assessment, the lead agency has estimated that total peak daily NO_x and PM₁₀ emissions from construction equipment to be 1,649 pounds per day of NO_x and 203 pounds per day of PM₁₀, exceeding the SCAQMD's recommended daily NO_x significance threshold of 100 pounds per day and the PM₁₀ significance threshold of 150 pounds per day for construction. At the bottom of page 10, the Air Quality Assessment concludes, "Note that the pollutant emissions, specifically NO_x and PM₁₀, are greater than the Significant Emission Thresholds established by the SCAQMD in the CEQA Air Quality Handbook, and therefore, the project construction emissions are considered significant." The lead agency disregards this conclusion in the environmental checklist.
5. A substantial problem is that the construction analysis focuses only on site preparation. There is no analysis of the building construction phase. Given that the proposed project consists of 2,363,860 square feet of buildings, building construction impacts could possibly exceed site preparation impacts. In particular, there is no analysis of VOC emissions from coatings used to paint the buildings. Architectural coating emissions from a project of this size could substantially exceed the SCAQMD VOC significance threshold of 75 pounds per day.
6. On page 14, the lead agency has also estimated long-term peak daily CO, VOC, NO_x and SO_x emissions from operational sources to be 5,019 pounds per day for CO, 316 pounds per day for VOC, 356 pounds per day for NO_x, and 308 pounds per day for SO_x, exceeding the SCAQMD daily CO significance threshold of 550 pounds per day, VOC significance threshold of 55 pounds per day, NO_x significance threshold of 55 pounds per day and the SO_x significance threshold of 150 pounds per day. At the bottom of page 14, the Air Quality Assessment concludes, "Table 8 shows that the total project emissions are above the SCAQMD thresholds for CO, ROG, NO_x and SO_x. Since the project emissions are above the significance thresholds, the project will result in a significant regional air quality impacts [sic]." The lead agency disregards this conclusion in the environmental checklist.

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Air Quality Assessment – Operational Emissions Calculation Worksheets

7. The lead agency estimated operational vehicle emissions using the EMFAC2002 emission factors and provided the number of daily trips (35,228) and total vehicle miles traveled (468,532). In the Final ND/EA, it would assist the public review if the lead agency would include the actual EMFAC 2002 model emission factors and the breakdown of the fleet used to generate mobile source emissions, of the source of the fleet mix.

Health Risk Assessment

8. The Centerpointe Business Park Diesel Particulate Health Risk Assessment estimates the risk generated from the proposed project. On pages 4 through 6, emission factor development is described. The text states that the idling emission factor was developed from the five mile per hour emission factor, because that is the lowest speed for which EMFAC2002 will generate an emission factor. EMFAC2002 will generate an idling emission factor in grams per hour when a zero is placed entered into as a vehicle speed. The final HRA used to support the CEQA document should use the emission factor estimated by EMFAC2002.
9. The HRA should present enough information for the reader to reproduce the analysis. Diesel particulate emission factors are presented on Table 1 of the HRA. The report does not detail what vehicle classes were used to develop the emission factors presented in Table 1. The emission factors presented are lower than the heavy-duty diesel emissions factors estimated by EMFAC2002. The agency should use the higher emission factor or explain why the lower factor was used. The final HRA used to support the CEQA document should include the EMFAC2002 output file and detail the development of the emission factors (e.g. which vehicle classes were used to develop the emission factors).
10. Sensitive receptors were represented by 14 discrete receptors in HARP. 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:

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HRA, cont.

“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).”

Exhibit 1 is a map of the discrete receptors; however, it does not show the location of the sources on the map. The highest estimated carcinogenic risk occurs at receptor D1. Since no receptors were located south D1, it is not clear if the D1 is actually the highest carcinogenic risk or only the highest risk for any of the 14 discrete receptors. Receptor grids would verify the location of the highest risk.

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).

11. On page 13 of the HRA the chronic noncarcinogenic hazard index (HI chronic) is estimated by dividing the peak 24-hour DPM concentration by the chronic inhalation reference exposure level (REL chronic). This is incorrect. HI chronic is estimated by dividing the annual DPM concentration by REL chronic. Therefore, based on the analysis presented in the HRA, HI chronic should be 0.0025. The final HRA used to support the CEQA document should include this correction.
12. 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.

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Mitigation Measures

13. On page 16 of the environmental checklist, the lead agency lists fugitive dust mitigation measures citing compliance with AQMD Rule 403 - Fugitive Dust. Complying with a rule, regulation, law, etc., should not be considered as mitigation if it is required. Instead, the effects of complying with a rule, e.g., Rule 403 should be part of the project description and incorporated into the project-specific impact calculations.
14. Because the short-term (construction) air quality impacts from the proposed project are estimated to exceed established daily significance thresholds for NO_x and PM10, and potentially for volatile VOCs, the SCAQMD 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. The lead agency should also review the mitigation measures in Section 3.(a. through c.) Air Quality in the Environmental Assessment (EA) to ensure that all measures included in the Environmental are consistent with the measures listed in Section 3.0 of the Air Quality Assessment (AQA).

VOC

Recommended Addition:

- Use required coatings and solvents with a VOC content lower than required under Rule 1113;
- Construct/build with materials that do not require painting;
- Use pre-painted construction materials.

PM10

Recommended Changes:

- Water active sites a minimum of ~~two~~ three times a day.(AQA)
- Pave or provide soil stabilizers according to manufacturers' specifications for parking areas and construction access roads to avoid dirt being carried onto main roadways. (AQA)
- Suspend all excavating and grading operations when speeds exceed, as instantaneous gusts, exceed 25 mph. (AQA)
- Sweep all streets at least once per day to prevent ~~if~~ visible soil materials from being carried onto adjacent public paved roads (recommend water sweepers with reclaimed water)are present. (AQA)
- ~~Encourage the~~ Use of "clean" street sweepers; (EA)

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Mitigation Measures cont.

PM10

Recommended Additions:

- Replace ground cover in disturbed areas inactive for (the lead agency should specify a period of time, for example: ten days or more).
- Apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more).
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation.

NO_x

Recommended Additions:

- Prohibit truck idling in excess of five minutes.
- 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.
- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site.

15. Because the long-term (operational) air quality impacts from the proposed project are estimated to exceed established daily significance thresholds for VOC, NO_x, CO, and SO_x, the SCAQMD recommends that the lead agency consider adding the following mitigation measures to further reduce operational air quality impacts from the project, if applicable and feasible. The lead agency should also review the mitigation measures in Section 3.(a. through c.) Air Quality in the Environmental Assessment to ensure that all measures included in the Environmental are consistent with the measures listed in Section 3.0 of the Air Quality Assessment.

Recommended Additions:

- Re-route truck traffic by adding direct off-ramps for the truck traffic or by restricting truck traffic on certain sensitive routes;
- Conduct air quality monitoring at sensitive receptors;

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Mitigation Measures cont.

Recommended Additions, cont.:

- Alternative fueled off-road equipment;
- 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;
- 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;
- 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;
- Design the warehouse/distribution center to ensure that truck traffic within the facility is located away from the property line(s) closest to its residential or sensitive receptor neighbors.
- Require the warehouse/distribution center to clearly define the primary entrance and exit of the warehouse/distribution center;
- Require warehouse/distribution centers to establish specific truck routes between the warehouse/distribution center and the freeway;
- Restrict overnight parking in residential areas;
- Establish overnight parking within the warehouse/distribution center where trucks can rest overnight;
- Enforce truck parking restrictions;
- Establish area(s) within the facility for repair needs.
- Require installation of electric hook-ups to eliminate idling of main and auxiliary engines during loading and unloading, and when trucks are not in use;
- Require all warehouse/distribution centers to operate the cleanest vehicles available;

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Mitigation Measures cont.

Recommended Additions, cont.:

- Flyers and pamphlets for truck drivers informing truck drivers of the health effects of diesel particulate and 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.
- 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.