



# South Coast Air Quality Management District

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135 North "D" Street  
Perris, CA 92570

## **Draft Environmental Impact Report for the Proposed Perris Ridge Commerce Center I**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The SCAQMD would also like to thank the lead agency for the additional time to submit comments. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final Environmental Impact Report. For future projects, the SCAQMD requests that the lead agency send with the Draft EIR all appendices or technical documents related to the air quality analysis and electronic versions of all air quality modeling and health risk assessment files.

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

RVC061220-11  
Control Number

### **Mobile Source Impacts**

1. Review of the emission factors used to calculate heavy-duty truck trip emissions indicate that the weighted delivery truck emission factors from the SCAQMD webpage were used. These factors are a weighted factor derived from all heavy-duty truck classes, e.g., light-, medium-, and heavy-heavy-duty trucks. Since it is likely that all delivery trucks will be heavy-heavy-duty trucks, it is recommended that emissions for these vehicles be calculated using the heavy-heavy-duty truck emission factors, which can be found at the following web address:  
[http://www.aqmd.gov/ceqa/handbook/onroad/onroadHHDT05\\_25.xls](http://www.aqmd.gov/ceqa/handbook/onroad/onroadHHDT05_25.xls) .
2. In Appendix C on page 20 of the Draft EIR, the lead agency uses an average vehicle miles traveled (VMT) per trip rate of 13.3 miles for all operational trips generated by the proposed project. Further, the VMT per trip was derived from the 1993 SCAQMD CEQA Handbook (page A9-24). The lead agency should be aware that the trip lengths on page A9-24 of the Handbook are for passenger vehicle trips, not haul trips. Since the California Air Resources Board's (CARB's) URBEMIS 2002 User's Guide shows a default home to work trip length of 10.6 miles per one-way trip (21.2 miles per round trip), the SCAQMD recommends that the lead agency use the CARB recommended VMT per trip to estimate construction worker and employee trip emissions in the Final EIR. Further, given that delivery trucks could make trips to deliver goods to the California border, a more reasonable truck trip delivery truck trip length is 40 miles per one-way trip. Given these more realistic trip lengths, emissions from haul trucks serving the proposed project would be substantially greater.

### **Cut and Fill Emissions During Site Preparation**

3. Based on the project description on page 3-5, construction activities include substantial cut and fill operations that may require haul trucks to move soil to various locations at the site, require removal of residual fill materials off-site and replacement of engineering fill materials. First, the analysis of construction emissions does not include fugitive dust emissions from cut and fill operations. The SCAQMD, therefore, recommends that the lead agency calculate the emissions from cut and fill operations and include the emission results in Table 4.3-9. In addition, the lead agency needs to calculate emissions from on- and off-road mobile diesel sources used in the cut and fill activities. The analysis in Appendix C should include any assumptions, the number of any on- and off-road trucks used, hours operated per day and the round-trip distances the trucks would travel to and from the haul site for cut and fill operations and the delivery of equipment and materials to facilitate review of the project.

### **Mitigation Measures for Construction Emissions**

4. Because construction air quality impacts remain significant for CO, NO<sub>x</sub>, and VOC after mitigation, the SCAQMD recommends the lead agency consider implementing

the following mitigation measures in addition to the measures listed in Section 4.3.7. (Impacts and Mitigation Measures) on pages 4.3-31 and 4.3-32 for construction to reduce applicable construction-related CO, NO<sub>x</sub>, and VOC emissions associated with the proposed project, if applicable and feasible:

- Prohibit truck idling in excess of five minutes;
- Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow; and
- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site.

For a list of additional measures to mitigate impacts from the proposed project, the lead agency is referred to the list of mitigation measures at the following URL:

[www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html) .

### **Mitigation Measures for Operational Air Quality Impacts**

5. Because project-specific operational air quality impacts from the proposed project are estimated to exceed the CO, NO<sub>x</sub> and VOC daily significance thresholds, the SCAQMD recommends that the lead agency consider the following additional mitigation measures to further reduce project-specific operational air quality impacts from the project in conjunction with other similar projects at the business park:

Recommended Additions:

- Prohibit all vehicles from idling in excess of five minutes, both on-site and off-site;
- 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;
- Restrict overnight parking in residential areas;
- Establish overnight parking within the warehouse/distribution center where trucks can rest overnight;
- Establish area(s) within the facility for repair needs;
- Post signs outside of the facility providing a phone number where neighbors can call if there is a specific issue;

- Develop, adopt and enforce truck routes both in and out of city, and in and out of facilities;
- Have truck routes clearly marked with trailblazer signs, so trucks will not enter residential areas;
- Identify or develop secure locations outside of residential neighborhoods where truckers that live in the community can park their truck, such as a Park & Ride;
- Provide food options, fueling, truck repair and or convenience store on-site to minimize the need for trucks to traverse through residential neighborhoods;
- Use street sweepers that comply with SCAQMD Rules 1186 and 1186.1;
- Require or provide incentives to use low sulfur diesel fuel with particulate traps or alternative fueled off-road equipment; and
- Conduct air quality monitoring at sensitive receptors.

In addition, a copy of the Western Riverside Council of Governments (WRCOG) "Good Neighbor Guidelines for Siting New and/or Modified Warehouse/Distribution Facilities" is available directly from WRCOG. The Guidelines were developed through the WRCOG's Regional Air Quality Task Force. The objective of the Guidelines is to provide local governments and developers with a menu of options of strategies that can reduce exposure to diesel particulate from new and/or modified warehouse or distribution centers. The Guidelines include 7 goals, and a variety of strategies for each goal that can be implemented in whole or part. There are a variety of benefits associated with adopting the guidelines, such as reducing the exposure of residents and sensitive receptors to diesel emissions. The Guidelines can be downloaded from the WRCOG web page at the following URL:  
<http://www.wrcog.cog.ca.us/publications/Good+Neighbor+Policies+Final-091205.pdf> .

### **Health Risk Assessment**

6. The HRA does not contain the EMFAC2002 input or output files for the SCAQMD staff to review to verify the EMFAC2002 emission factors. The HRA should include the output from the EMFAC2002 run or a list of parameters used in the EMFAC2002 run. The parameters that should be included in the Final HRA are location (Basin, district or county), season (summer, winter, annual, etc.), temperature, humidity, vehicle type (HHD-Diesel, etc.), and any other changes to EMFAC2002 default values.
7. The diesel particulate health risk assessment (HRA) states that idle emission factors were estimated from factor miles per hour (mph) travel speeds because; five mph is the lowest speed for which EMFAC2002 will generate an emission factor. This is not correct. EMFAC2002 will generate an idling emission factor, if the speed is set to zero mph. For idling emissions, the HRA in the Final EIR should include emissions based on the EMFAC2002 emission factors.

8. The HRA was completed with the assumption that diesel trucks idle 10 minutes per trip. The Final HRA should include documentation justifying this assumption. SCAQMD staff suggests that 15 minutes per trip should be used as a default for warehouses. The 15 minutes assumes five minutes of idling either at a guard station or waiting for a dock, five minutes of idling at a dock and five minutes of idling waiting to leave the dock or at scales. If site specific documentation is not available, then the Final HRA should include 15 minutes of idling per trip.
9. There appears to be an error in the conversion of the roadway emission factor from grams per mile to grams per second. However, because equations are not provided, this can not be verified. Based on a speed of 25 miles per hour and the 0.04970 gram per mile emission factor, the emission factor in grams per second should be 0.000345 grams per second ( $0.04970 \text{ gram/mile} \times 25 \text{ mile/hour} \times \text{hr}/3,600 \text{ seconds}$ ), which is an order of magnitude greater than the 0.000014 grams per second. Presented on page 18 of the HRA. The Final EIR should include the corrected equations and document the equations used to estimate the emission rates developed for the ISCST3 air dispersion modeling.
10. Page 7 of the HRA states that the average daily traffic volumes presented in Table 3 on Page 8 were converted from PCE to actual volumes. However, Table 3 states that the average truck traffic is in passenger car equivalents. The data in Table 3 are used in the emission factor worksheets on pages 18 and 19. On page 18, it appears that the PCE to actual truck volume conversion factor is 0.40. No source for the truck volume of 2,568 on page 19 could be found. The Final HRA should document the basis for the 0.40 PCE to actual truck volume conversion factor and document the basis for the truck volume on page 19.
11. Health risks were estimated for 12 discrete receptors. It is unclear why only a single receptor was used to represent each residential area. SCAQMD Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis ([http://www.aqmd.gov/ceqa/handbook/mobile\\_toxic/mobile\\_toxic.html](http://www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.html)) states the following:

“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 a 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 should be completed with receptor grids as described in the SCAQMD Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis. The receptors should also be described (residential, schools, day-care centers, hospitals, etc.).

12. A discussion of health risk from the proposed project upon off-site worker is included on page 11 of the HRA; however, off-site worker health risk is not presented in the HRA. The sensitive receptor locations discussion on page 9 and the ISCST3 outputs file appears to show that worker receptors were not included in the air dispersion modeling and HRA. Exhibit 2 on page 10 of the HRA appears to show several commercial/industrial buildings near the proposed project site. Receptor grids should be used to estimate health risk to off-site worker. The Final HRA should include off-site worker health risk.