



# South Coast Air Quality Management District

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January 4, 2007

Mr. Gabriel Diaz, Associate Planner  
Community Development Department/  
Planning Division  
City of Moreno Valley  
14177 Frederick Street  
Moreno Valley, CA 92552-0805

Dear Mr. Diaz,

**Draft Mitigated Negative Declaration (Draft MND) for the Proposed  
Initial Study for: PA06-0021, Tentative Parcel Map No. 34577,  
PA06022 Plot Plan, PA06-0048 Plot Plan, PA06-0049, and Tentative  
Parcel Map No. 34576**

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 Mitigated Negative Declaration (Final MND).

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final MND. 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 and Area Sources

SS:GM

RVC061212-02  
Control Number

### **Air Quality Analysis**

1. Fugitive dust cut and fill emissions were not included in the URBEMIS2002 estimates. Since the amount of fill material is known, the Level 2 in the URBEMIS2002 program should be used to estimate the amount of fugitive dust emissions that would be generated by the 140,950 cubic yards of fill materials.
2. The lead agency has activated the mitigation measures for both soil stabilizers and watering in the URBEMIS2002 construction emission estimates. A bug, however, has been identified in the model with regards to mitigating PM emissions during grading. Until it has been corrected in the URBEMIS2002 model, the lead agency should not select a combination of PM10 mitigation measures for grading, but rather select the "user defined" control measure. For example, type in "watering three times per day" and then manually input 68 percent control efficiency into the model.

### **Localized Significance Thresholds**

3. In addition to analyzing regional air quality impacts the SCAQMD recommends calculating localized air quality impacts for construction and comparing the results to localized significance thresholds (LSTs). LST's can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the proposed project, it is recommended that the lead agency perform a localized significance analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>.

### **PM2.5 Significance Thresholds**

4. In response to adoption of PM2.5 ambient air quality standards by U.S. EPA and CARB, SCAQMD staff has developed a methodology for calculating PM2.5 emissions when preparing air quality analyses for California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) documents. To determine if PM2.5 air quality impacts are significant, SCAQMD staff has also developed recommended regional and localized significance thresholds. For the Final MND and for future projects, when preparing the air quality analysis, it is recommended that the lead agency perform a PM2.5 significance analysis by following the guidance found at [http://www.aqmd.gov/ceqa/handbook/PM2\\_5/PM2\\_5.html](http://www.aqmd.gov/ceqa/handbook/PM2_5/PM2_5.html) Further, SCAQMD staff has compiled mitigation measures to be implemented if the PM2.5 impacts are determined to be significant. Mitigation measure suggestions can be found at [http://www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html)

### **Mitigation Measures - Construction**

5. Because the lead agency's air quality analysis shows that criteria pollutant emissions exceed the SCAQMD's construction daily significance thresholds for oxides of nitrogen (NO<sub>x</sub>), the SCAQMD recommends that the lead agency consider adding the following mitigation measures to further reduce NO<sub>x</sub> impacts from the project, if applicable and feasible:

Recommended Additions:

#### NO<sub>x</sub>

- Prohibit truck idling in excess of five minutes;
  - Use alternative fueled off-road equipment;
  - Use street sweepers that comply with SCAQMD Rules 1186 – PM10 Emissions from Paved and Unpaved Roads, and Livestock Operations and Rule 1186.1 – Less Polluting Sweepers;
  - Require construction equipment that meet or exceed Tier 2 standards; use emulsified diesel fuels; and equip construction equipment with oxidation catalysts, particulate traps, or other verified/certified technologies, etc.;
  - Use electricity from power poles rather than temporary diesel or gasoline power generators;
  - 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.
  - 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;
  - Improve traffic flow by signal synchronization;
  - Properly tune and maintain vehicles and equipment according to manufacturers' specifications.
6. Should the lead agency, after final review (see comment #2), determine that the short-term (construction) air quality impacts from the proposed project are estimated to exceed established daily significance thresholds for particulate matter (PM10) fugitive dust, the SCAQMD recommends that the lead agency consider modifying the following mitigation measures and adding additional mitigation measures to further reduce construction PM10 air quality impacts from the project, if applicable and feasible:

Recommended additions:

- Install wheel washers where vehicles enter and exit the construction site onto paved roads or wash off trucks and any equipment leaving the site each trip;
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation;
- Apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more);
- Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 mph;
- All trucks hauling dirt, sand, soil, or other loose materials are to be covered;
- Apply water three times daily, or non-toxic soil stabilizers according to manufacturers' specifications, to all unpaved parking or staging areas or unpaved road surfaces;
- Pave road and road shoulders; and
- Sweep streets at the end of the day if visible soil is carried onto adjacent public paved roads (recommend water sweepers with reclaimed water).

**Mitigation Measures - Operations**

7. Because project-specific operational air quality impacts from the proposed project are estimated to exceed established daily significance thresholds for carbon monoxide (CO), oxides of nitrogen (NO<sub>x</sub>), and volatile organic compounds (VOC), and that the proposed project will attract a relatively large number of diesel truck trips, the SCAQMD recommends that the lead agency consider incorporating the following change to the mitigation measure in the Draft MND, and recommends additional mitigation measures to ensure that air quality impacts from the operation of the project in conjunction with other similar, existing and future projects at the business park do not adversely affect any nearby sensitive receptors:

Recommended Change:

- Require trucks to be offloaded promptly ~~to prevent trucks idling for longer than five minutes~~ and prohibit all vehicles from idling in excess of five minutes, both on- and off-site;

Recommended Additions:

- 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;
- Restrict overnight parking in residential areas;

- Establish overnight parking within the warehouse/distribution center where trucks can remain stationary 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 site;
- Provide food options, fueling, truck repair and or convenience store on-site to minimize the need for trucks to traverse through residential neighborhoods;
- 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 – PM10 Emissions from Paved and Unpaved Roads, and Livestock Operations and Rule 1186.1 – Less Polluting Sweepers;
- Require or provide incentives to use low sulfur diesel fuel with particulate traps;
- Use alternative fueled off-road equipment; and
- Conduct air quality monitoring at sensitive receptors.

### **Cumulative Project Impacts**

8. In the Draft CEQA document, the SCAQMD recommends that the lead agency include a discussion in the Draft CEQA document of closely related past, present or reasonably foreseeable future projects near the proposed project site which could, with the proposed project impacts, result in cumulatively significant impacts. Refer to the SCAQMD CEQA Air Quality Handbook Chapter 9 on page 9-11 and to CEQA Guidelines §15355 and §15355(b) for a more detailed discussion of cumulative impacts analysis.

### **Health Risk Assessment**

9. OEHHA has modified their carcinogenic health risk calculation from unit risk based to a cancer potency based calculation. The diesel exhaust particulate OEHHA cancer potency value for diesel exhaust particulate is  $1.1 \text{ (mg/kg-d)}^{-1}$ . Guidance on estimating health risk based on cancer potency is provided in the SCAQMD Risk Assessment Procedures for Rules 1401 and 212 (<http://www.aqmd.gov/prdas/Risk%20Assessment/RiskAssessment.html>). The Final CEQA document should include health risk based on the OEHHA cancer potency value for diesel particulate exhaust.

10. No worker risk was estimated in the HRA. Typically worker risk is estimated at worksites adjacent to the project site. Guidance on estimating worker health risk based on cancer potency is provided in the SCAQMD Risk Assessment Procedures for Rules 1401 and 212 (<http://www.aqmd.gov/prdas/Risk%20Assessment/RiskAssessment.html>). Worker risk needs to be included in the Final CEQA document.

### **CO Hotspots Analysis**

11. The link widths for all links within an intersection are the same. Based on Figure 3 in the City of Moreno Valley Moreno Valley Business Park Traffic Impact Analysis, May 6, 2006 (Traffic Analysis) provided by Michael Brandman Associates in a separate submittal than the Initial Study, the lane widths do vary between link types. For example, the left turn links are a single lane, while the through links are two or three lanes at the intersection of Perris Boulevard and Iris Avenue. The link geometry should reflect the actual intersections in the CO hotspots analysis for the Final CEQA document.
12. Receptors have been placed within three meters of either side of the roadway in the CALINE4 air dispersion modeling, which is considered within the mixing zone of traffic. The CALINE4 modeling should follow the Caltrans Transportation Project-Level Carbon Monoxide Protocol (CO Protocol), Revised December 1997, which can be downloaded from the Caltrans website at <http://www.dot.ca.gov/hq/env/air/coprot.htm>. The CO Protocol states that receptors should not be placed within three meter mixing zone on either side of the roadway. Final EIR should not include CALINE4 modeling with receptors placed within the three meter mixing zones on both sides of the roadway.
13. The traffic volumes in the CALINE4 air dispersion modeling do not match the traffic volumes presented in the Traffic Analysis. The traffic volumes used for analysis and significance determination in the Final CEQA document should be consistent for every environmental topic.