



South Coast
Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

FAXED: JUNE 29, 2007

June 29, 2007

Mr. Gabriel Diaz
City of Moreno Valley
Community Development Department, Planning Division
14177 Frederick Street
Moreno Valley, CA 92553

Dear Mr. Diaz:

Mitigated Negative Declaration (MND)
Nandina Distribution Center: PA06-0151 TPM No. 35150 & PA06-0153
(June 2007)

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 in the Final Mitigated negative Declaration.

Please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Mitigated Negative Declaration. The SCAQMD would be available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Charles Blankson, Ph.D., Air Quality Specialist – CEQA Section, at (909) 396-3304 if you have any questions regarding these comments.

Sincerely

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

Attachment

SS: CB

RVC070608-01
Control Number

Mitigated Negative Declaration (MND)
Nandina Distribution Center

1. Operational Emissions:

There is a discrepancy between the number of daily vehicle trips calculated by URBEMIS; 4,708.34; versus 6,167 daily vehicle trips from the Traffic Study (Kunzman, 2007). This means that the air quality analysis underestimates operational emissions because the URBEMIS model calculates emissions for 4,708.34 daily trips instead of the 6,167 from the traffic study. The SCAQMD requests that the lead agency re-run the model using the trip rates from the traffic study for the Final MND.

2. URBEMIS Model Run and Project Emissions:

Review of the URBEMIS 2002 model output file indicated a couple of minor discrepancies. The project description indicated that the total project site is 53.27 acres and that six acres per day will be graded. The model shows a total acreage of 54.3 acres and seven acres disturbed per day. These discrepancies, however, tend to make impacts reported slightly worse. In addition, the project description indicates that structures on the site will be demolished over a two-month period before grading and building construction begin. It appears that the lead agency's consultant did not include a volume for the structures to be demolished, either a total building volume or on a volume demolished on a daily basis. It is recommended that the demolition analysis be re-run to include the volume of the buildings to be demolished.

3. CARB Land Use Compatibility and HRA:

On page 2 of the *Air Quality and Noise Impact Consistency Analysis (AQNICA)* report (October 2006), the lead agency states that because the proposed distribution center is located 2,070 feet from the nearest sensitive receptors, a health risk assessment (HRA) is not warranted. The buffers in CARB's Handbook are recommended for siting projects consisting of sensitive receptors to protect them from existing sources of air toxics. The proposed project under construction is a warehouse project that attracts over 300 medium- to heavy-duty diesel trucks. Because the project is a warehouse and not a sensitive receptor, the guidance in the CARB Handbook may not be applicable. Since particulate matter from diesel combustion is classified as a carcinogen by CARB, the SCAQMD recommends that a mobile source HRA be performed. Guidance for preparing a mobile source HRA can be found online at the SCAQMD CEQA webpages at the following URL: www.aqmd.gov/handbook/mobile_toxic/mobile_toxic.html.

4. SCAQMD Regulation XV:

On page 2 of the AQNICA the lead agency identifies mitigation measures from the Specific Plan 208 EIR from 1989. At that time Regulation XV was in effect. However, since that time, Regulation XV was replaced by Rule 2202 – On-Road

Motor Vehicle Mitigation Options in December 1995. Rule 2202 applies to employers with 250 or more employees. It is recommended that this mitigation measure be updated to reflect the requirements of Rule 2202 and incorporated into the Final MND.

5. SCAQMD Recommended Mitigation Measures:

If the revised analysis pursuant to comment #1 indicates that operational emissions are significant, the following mitigation measures should be required by the lead agency:

- Require the use of on-road trucks that meet or exceed CARB's year 2007 standards.
- Require trucks to be properly tuned and maintained.
- Require warehouse management to train employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks at the facility.
- Require trucks to be offloaded promptly to prevent trucks idling for longer than five minutes.
- Reroute truck route to avoid residential areas or schools.
- Restrict overnight parking in residential areas.
- Establish overnight parking within the warehouse complex where trucks can rest overnight.
- Require installation of electrical sources for service equipment or docking of trucks to eliminate idling of main or auxiliary engines during loading and unloading, and when trucks are not in use.
- Use light-colored roofing materials as opposed to dark roofing materials to deflect heat and conserve energy.
- Install solar panels on roofs to supply electricity for air-conditioning.
- Use double-paned windows to reduce thermal loss.
- Install high energy-efficient appliances such as water heaters, refrigerators, furnaces and boiler units.
- Install automatic lighting on/off controls and energy-efficient lighting.
- Landscape with appropriate drought-tolerant plants to reduce water consumption.
- Construct pedestrian and transit-friendly facilities such as wider sidewalks, bus stops with passenger benches and shelters, bikeways or lanes. Sidewalks and bikeways should be landscaped with trees.
- Install electrical outlets around the facility to facilitate the use of electrical landscape maintenance equipment.
- Provide food options, fueling, truck repair and or convenience store on-site or within the warehouse complex to minimize the need for trucks to traverse through residential neighborhoods.

6. URBEMIS 2007

The lead agency should be aware that URBEMIS 2007 is now available and can be downloaded from the following URL: www.urbemis.com. Because the CEQA document for the proposed project was released before the availability of URBEMIS 2007, the request to re-run the analysis can be performed with either URBEMIS 2002 or URBEMIS 2007.