South Coast
Air Quality Management District
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FAXED: NOVEMBER 20, 2007

November 20, 2007

Mr. Josias Gonzales
County of Riverside
Transportation and Land Management Agency
Planning Department
4080 Lemon Street, 9th Floor
Riverside, CA 92502

Dear Mr. Gonzalez:

Draft Environmental Impact Report (DEIR) for the Harvill Center (September 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 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 certification of the Final Environmental Impact Report. 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

RVC071005-01
Control Number

Draft Environmental Impact Report (DEIR) for
Harvill Center: September 2007

1. **URBEMIS 2007**: The lead agency should be aware that URBEMIS 2007 became available in June 2007. Given the fact that the air quality analysis for the proposed project was already under preparation at the time the URBEMIS 2007 model was released, SCAQMD staff is not requesting that the air quality analysis be revised using the updated model, although the lead agency may wish to update the analysis. However, if the model is used in the future, URBEMIS 2007 should be used to calculate air quality impacts. URBEMIS 2007 is available at the following URL: www.urbemis.com.

2. **Project Size:** Review of the DEIR indicates that there are several discrepancies with regard to describing the project acreage and the area of the industrial buildings. On pages 1-1 and 2-1 of the DEIR the proposed project is described as comprising the development of 370,000 square feet of industrial buildings on a 20-acre parcel of land. On page 1 of Appendix B, the lead agency described the project as comprising 354,000 square feet of manufacturing space on 14 acres. However, in calculating the proposed project's construction and operational emissions, the URBEMIS output sheets show the area as 19.5 acres, while the building area is shown as 354,000 square feet. Although these discrepancies appear to be minor, the area of building to be constructed could influence daily construction emissions, which in the case of NOx emissions for the proposed project, are relatively close to the construction significance threshold for NOx of 100 pounds per day. As a result, SCAQMD staff recommends that the model be rerun if the actual building area is 370,000 square feet. Should revised emission exceed any applicable significance thresholds recommended for use by the SCAQMD, recommended mitigation measures can be found in Chapter 11 of the SCAQMD's CEQA Air Quality Handbook or online at: www.aqmd.gov/handbook/mitigation/onroad/MM_onroad.html.

3. **PM2.5:** The analysis of both construction and operational air quality impacts does not include estimates of PM2.5 emissions. The SCAQMD has requested that lead agencies calculate PM2.5 emissions since the beginning of January 2007. The lead agency can calculate PM2.5 emissions using the URBEMIS2007 model or use the methodology recommended by the SCAQMD, which can be found online at http://www.aqmd.gov/ceqa/handbook/PM2_5/PM2_5.html.

4. **EMFAC 2002:** The lead agency used emission factors from EMFAC 2002 to analyze the CO Hot Spots. EMFAC 2007 has been available since November 2006 and the lead agency should use these current emission factors to analyze the carbon monoxide hot spots impacts for the Final EIR.

Health Risk Assessment

5. **Idling Emissions:** The idling emission factor (0.165 gram per hour) was developed from the three mile per hour emission factor, which is a methodology generated for use in earlier versions of EMFAC than the most current version, EMFAC2007, because earlier versions did not generate idling emissions. Idling emission factors (gram/hour) can be estimated by EMFAC2007 by including a speed of zero miles per hour. EMFAC2007 idling emission factor (1.79 gram per hour – heavy-heavy diesel) should be used instead of developing idling emission factors from the three mile per hour emission factors.

6. **Vehicle Fleet Mix:** The vehicle fleet mix for the health risk analysis was taken from the *City of Fontana Truck Trip Generation Study* for light warehouse land uses. The air dispersion modeling emission rate for the analysis included in the DEIR circulated for public review excluded emissions from non-heavy, heavy trucks. No emissions were included for the three-axle and large two-axle categories.

   Subsequent to the release of the DIER for public review, the fleet mix was corrected and a second air dispersion modeling run was completed and provided to SCAQMD staff. The second air dispersion modeling includes emissions from non-heavy, heavy trucks (categorized as medium trucks). The second air dispersion modeling also corrects the number of truck trips. The original air dispersion modeling included twice the number of proposed truck trips. The health risk from the corrected air dispersion modeling run is less than the health risk presented in the CEQA document, which was determined by the lead agency to be less than significant. Therefore, SCAQMD staff has no further comments on the vehicle fleet mix used in the health risk assessment.