



South Coast  
Air Quality Management District

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

**FAXED: NOVEMBER 2, 2007**

November 2, 2007

Mr. Gustavo N. Gonzalez  
City of Riverside  
Community Development Department  
3900 Main Street, Third Floor  
Riverside, CA 92522

Dear Mr. Gonzalez:

**Negative Declaration (ND) for  
The Citrus Business Park: TPM 35299**

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 Negative Declaration.

Please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final 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

RVC071003-07  
Control Number

**Negative Declaration (ND) for  
The Citrus Business Park: TPM 35299**

**Diesel Truck Emissions**

The proposed project is expected to generate 2,917 vehicle trips per day. About 14 percent or 408 of these vehicle trips would be medium to heavy-duty truck trips. Trucks are a substantial source of diesel particulate emissions. With the designation of diesel particulates as a carcinogen by the California Air Resources Board (CARB), the SCAQMD recommends that the health impacts of diesel particulates from the proposed project's truck traffic be assessed, especially in light of the fact that residences are located east of the proposed project. The SCAQMD has prepared a methodology for performing an air toxics health risk analysis for truck emissions. This methodology can be accessed at the SCAQMD website at:

[www.aqmd.gov/ceqa/handbook/diesel\\_analysis.doc](http://www.aqmd.gov/ceqa/handbook/diesel_analysis.doc) under Health Risk Assessment Guidance.

**Mitigating Project Emissions:**

In the event the recommended mobile source health risk assessment results in significant adverse cancer risk impacts, SCAQMD staff recommends that the lead agency consider the following measures for implementation:

- Require that trucks use alternative clean fuel such as compressed natural gas or be fitted with particulate filters and oxidation catalysts.
- Require the use of newer, lower-emitting trucks.
- Require trucks to be properly tuned and maintained.
- Require training of warehouse managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks within the facility.
- Require trucks to be offloaded promptly to prevent trucks idling for longer than five minutes.
- Design warehouse to ensure truck traffic within the facility is located away from the property line(s) closest to its residential or sensitive receptor neighbors.
- Create a buffer zone of at least 1,000 feet between warehouse and sensitive receptors. Buffer zone can be office space, employee parking or greenbelt.
- Reroute or provide information on truck routes to avoid residential areas or schools.
- Restrict overnight parking in residential areas by establishing overnight parking within the warehouse complex where trucks can rest overnight.
- Provide electrical hook-ups for trucks that need to cool their load.
- Electrify auxiliary power units.
- Electrify service equipment at facility.
- 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.

The SCAQMD recommends that mitigation measure K on page 26 of the Draft MND be modified to add the following at the end of the sentence, “and that no more than 20,000 square feet of building area shall be painted in any one-day period.”

Additional mitigation measures for on-road heavy-duty vehicles can be found online at [www.aqmd.gov/handbook/mitigation/onroad/MM\\_onroad.html](http://www.aqmd.gov/handbook/mitigation/onroad/MM_onroad.html).

**Air Quality Analysis:**

The URBEMIS 2007 output printout was not included in the initial ND that was released for public comment. SCAQMD staff received a copy upon request. Please include this attachment in the Final Negative Declaration.