



South Coast Air Quality Management District

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**Draft Mitigated Negative Declaration for the Proposed Planning Cases P05-0069
and P05-0150: Panattoni Development – Sycamore Canyon**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. Based on staff's review of the associated Air Quality Analysis document, it is likely that the proposed project will generate significant adverse NO_x and VOC construction air quality impacts and significant cumulative construction and operational air quality impacts. As such, the project does not qualify for a negative declaration. The SCAQMD recommends that the air quality analysis be revised and an EIR be prepared and circulated for public review.

The SCAQMD 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
Planning, Rule Development & Area Sources

Attachment

SS:GM

RVC051004-01
Control Number

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Air Quality Analysis

1. Table E on page 19 of the Air Quality Analysis document shows total combustion emissions from construction equipment and construction worker commute trips. The text states that these results were derived using the emission factors from the SCAQMD CEQA Air Quality Handbook and the California Air Resources Board's (CARB) EMFAC2002 computer model. However, the lead agency should also include the actual emission factors used, load factors, horsepower rating, etc. and the methodology used to estimate emissions in Table E on page 19. Using the information provided in Table E and using the following equation in Table A9-8 in the Handbook, $E = (F \times G) \times (K \times L \times M)$ and the associated factors in Tables A9-8-B, A9-8-C, and A9-8-D, staff recalculated the construction emissions and has concluded that the construction emission estimates are underestimated. In the case of NOx emissions, emissions exceeded the SCAQMD's recommended NOx construction significance threshold by a wide margin, approximately 150 pounds of NOx per day.
2. The text at the bottom of page 19 of the Air Quality Analysis document states that, although construction of the building uses different types of equipment, emissions from construction are anticipated to be below the peak day emissions shown in Table E. However, the lead agency has not quantified emissions. Without quantifying construction emissions, the lead agency has not demonstrated that construction air quality impacts are not significant.
3. On pages 20 and 21 of the Air Quality Analysis document, the architectural coatings are calculated using an emission factor taken from the SCAQMD Handbook (Table A9-13-C) which is based on the usage of air atomized spray equipment applying coating with a VOC content limit at 103 grams per liter. Coatings with a VOC content of 103 grams per liter are appropriate for residences, but not for commercial or industrial operations. Instead, the analysis should assume the use of industrial maintenance coatings with a VOC content limit of 250 grams per liter to more accurately account for the appropriate type of coatings used at industrial/commercial facilities. Based on the information provided and using a coating with 250 grams per liter at 65 percent transfer efficiency, VOC emissions from applying architectural coatings would likely exceed the construction VOC significance threshold of 75 pounds per day. Although the discussion identifies measures to reduce VOC emissions from architectural coatings, e.g., the use of precoated/natural-colored building materials, low-VOC architectural coatings, etc., the lead agency does not require these measures to mitigate VOC air quality impacts from architectural coatings.

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Unless these measures to mitigate VOC emissions from architectural coatings are required as part of the project description or as enforceable mitigation measures, VOC emissions from architectural coatings should be considered significant. Finally, the analysis of architectural coatings does not include emissions from other sources such as equipment to operate spraying equipment, construction worker commute trips, etc.

Cumulative Impact Evaluation

4. In Section 5.8 on page 33 of the Air Quality Analysis document, the lead agency dismisses potentially significant cumulative air quality even though acknowledging that “construction could result in substantial short-term increases in air pollutants.” The lead agency states further, “The project would also contribute cumulatively to local and regional air quality. This discussion ignores the air quality impacts of similar projects located in the same business park. For example, Figure 10 (Approved and Pending Project Locations) in the Traffic Study shows 15 project areas for the Sycamore Canyon Business Park. CEQA documents for two separate proposed projects in the business park have recently been received by the SCAQMD for CEQA review. Those two CEQA documents were for projects Planning Case P05-059 and P05-0931 - Trammel Crow received September 2, 2005 and P05-0069 and P05-0150 - Panattoni Development received October 4, 2005. In addition, based on a phone conversation between the lead agency and SCAQMD staff on October 14, 2005, there is a third project with a similar land use in the same business park for which the lead agency will soon be circulating a CEQA document. Based on the proposed construction and completion schedules, all three projects would potentially have overlapping construction air quality impacts and will have overlapping operational phase air quality impacts. Although the lead agency has prepared separate CEQA documents for the three projects, it has ignored overlapping construction and operational air quality impacts from these three related projects. A more defensible approach would have been to prepare a program or master EIR for the entire business park to more adequately consider cumulative impacts from all related projects in the business park. Consistent with CEQA Guidelines § 15130, the lead agency should consider air quality impacts from past, present and probable future projects producing related or cumulative impacts for all projects on or near the business park.

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Health Risk Assessment

5. Default EPA regulatory dispersion options and a rural dispersion coefficient were used. SCAQMD requires ISCST3 modeling to be completed with regulatory defaults options implemented with the exception that the calm processing option should be disabled (i.e., NOCALM control option). SCAQMD also requires that the urban dispersion parameter be used (i.e., URBAN control option). The final air dispersion modeling should include the NOCALM and URBAN control option.
6. The analysis assumed an idle time of 1.5 minutes per trip. Although California prohibits idling for more than five consecutive minutes, it is likely that trucks will idle for more than 1.5 minutes per trip. CARB's EMFAC2002 (BURDEN2002) model assumes that heavy-duty trucks idle 21 minutes per truck trip. Assuming that a portion of this idling occurs when the truck stops for stop signs, signals, etc., a more conservative assumption for on-site idling would be a minimum of 10 minutes per truck visiting the site. Alternatively, the lead agency could impose a condition prohibiting idling for more than 1.5 minutes.

Mitigation Measures for Construction Air Quality Impacts

7. In the event that construction air quality impacts from the proposed project are estimated to exceed established daily significance thresholds for VOCs, the SCAQMD staff recommends that the lead agency consider adding the following mitigation measures to further reduce construction air quality impacts from the project, if applicable and feasible:

VOC Emissions from Architectural Coatings

Require the project proponent to:

- Use coatings and solvents with a VOC content lower than required under Rule 1113.
- Construct/build with materials that do not require painting
- Restrict daily coating usage to less than approximately 65 gallons per day (assuming a VOC content of 1.1 pound per gallon).

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Mitigation Measures for Construction Air Quality Impacts, cont.

8. Since it is likely that NOx construction air quality impacts from the proposed project exceeds established daily significance thresholds, the SCAQMD recommends that the lead agency consider the following additional mitigation measures to reduce construction air quality impacts from the project, if applicable and feasible:

Recommended Additions:

- Prohibit all diesel trucks from idling in excess of five minutes, both on-site and off-site.
- Reroute construction trucks away from congested streets or sensitive receptor areas.
- 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.
- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site.
- Give preferential consideration to contractors who use clean fuel construction equipment; emulsified diesel fuels; construction equipment that uses low sulfur diesel and is equipped with oxidation catalysts, particulate traps, or other retrofit technologies, etc.

Mitigation Measures for Operational Air Quality Impacts

9. Although project-specific operational air quality impacts from the proposed project are currently not estimated to exceed any established daily significance thresholds, given that the proposed project will contribute to significant adverse cumulative air quality impacts, the SCAQMD recommends that the lead agency consider the following additional mitigation measures to further reduce cumulative 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.

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Mitigation Measures for Operational Air Quality Impacts, cont.

Recommended Additions, cont.:

- 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.
- 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 and 1186.1;
- Require or provide incentives to use low sulfur diesel fuel with particulate traps;
- Alternative fueled off-road equipment;
- Conduct air quality monitoring at sensitive receptors.