



South Coast Air Quality Management District

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FAXED: MAY 11, 2006

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Mr. Bulmaro Canseco
Riverside County
Department of Planning
P. O. Box 1409
Riverside, CA 92502-1409

Dear Mr. Canseco:

**Revised Air Quality Analysis for the Eastpoint Business Park:
February 21, 2006**

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 EIR for the proposed project.

SCAQMD staff is concerned about the proposed truck routes to and from the proposed business park in relation to the nearby freeways. The lead agency proposes three different scenarios for truck trip distribution. To reduce the health risks to the residences, Jurupa Valley High School and other sensitive receptors along Bellegrave Avenue and Cantu-Galleano Ranch Road, SCAQMD staff recommends that the project proponent select Scenario A which assumes most of the truck traffic will exit the project site and use Bellegrave Avenue and Van Buren Boulevard to access SR-60. Scenario A would also avoid trucks passing along the southern boundary of the proposed Hillcrest Homes Project which includes an elementary school and a neighborhood park. SCAQMD staff is concerned that allowing a percentage of trucks on multiple truck routes as compared to one truck route would be difficult to enforce. This recommendation is consistent with Goal 2 of the Good Neighbor Guidelines for Warehouse which recommends the establishment of specific truck routes with appropriate signage.

Attached please find additional comments regarding the proposed project. 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 Revised Air Quality Analysis. The SCAQMD would be happy 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

Susan Nakamura
Planning and Rules Manager
Planning, Rule Development & Area
Sources

Attachment

SN: CB
RVC060413-01
Control Number

**Revised Air Quality Analysis for the Eastpoint Business Park
February 21, 2006**

Health Risk Assessment

1. Table 4 in the Health Risk Assessment Eastpoint Business Park, August 24, 2005, presents cancer risk from sensitive receptors in the project vicinity. Based on the table, the highest risk is 9.0 at Receptor 3 under Scenario A. Table 4 only includes discrete receptors chosen by the consultant, it does not show cancer risk at gridded receptors.
2. In the output file for Scenario A, the concentration at the receptor found at UTM coordinate 453000, 3762800 which appears to be located at a residential property, is 0.03304 micrograms per cubic meter. At this concentration, the cancer risk is close to 10 in a million if estimated using the diesel exhaust unit risk factor and above 10 in a million if the cancer potency method is used using residential receptor parameters. Table 4 should include the concentrations estimated at gridded receptors. The Final EIR HRA should include a table that shows the UTM, modeled PM10 concentration and risk at receptors with the highest concentration/cancer risk values. The conclusion of the HRA should be adjusted if cancer risks are found to be above the significance threshold of 10 in a million.

CO Hotspots

1. CO hotspots analyses should be completed according to the CALTRANS Transportation Project-Level Carbon Monoxide Protocol (CO Protocol), Revised December 1997, UCD-ITS-RR-97-21. The CO Protocol can be downloaded from the CALTRANS website at <http://www.dot.ca.gov/hq/env/air/coprot.htm>. Appendix B of the CO Protocol states that intersections with dedicated left turn lanes should be modeled using separate through and left turn methods as illustrated in Figure B.3 of the CO Protocol. The dedicated left-turn link endpoint should be located at the center of the adjacent turn link, and extend as far back as the link representing the through movement. The through approach link volume should not include the right turn approach volume. The left-turn link end point is located before the intersection and does not extend to the through movement link. The Final EIR should include CALINE4 modeling with left turn links represented as prescribed by the CO Protocol.
2. There are errors in the application traffic volumes in intersection links (e.g., southbound departure link, northbound approach link and eastbound external departure link of Etiwanda Avenue and Van Buren Boulevard). Traffic volumes appear to be correctly calculated but not assigned to the

correct link. The traffic volumes should be assigned to the correct links in the Final EIR.

3. Link and receptor heights are set at 1.8 meters. Typically if the road and receptors are at grade the receptors are 1.8 meter higher than the road, because the breathing area of a standard person is assumed to be 1.8 meters above ground. Based on the CALINE input files, either the roads are elevated by 1.8 meters or the receptors are 1.8 meter below grade. The link and receptor heights should be corrected in the Final EIR.
4. Page 18 of the Revised Air Quality Analysis states that the background 1- and 8- hour CO concentrations were obtained from SCAQMD. A 1-hour CO background concentration of 6.7 ppm was used for the existing, project and cumulative scenarios. It appears that the 6.7 ppm concentration was taken from the future 1-hour CO background concentrations for 2000, which is higher than the actual background concentration and the future 2010 concentration and therefore conservative. SCAQMD staff could not verify how the 8-hour concentrations were estimated. The 8-hour concentrations could not be reproduced with the existing and future CO concentrations and the 0.74 persistence factor presented on page 18 of the Revised Air Quality Analysis. The Final EIR should include a detailed description on the development of the 1-hour and 8-hour concentrations in enough detail that the public can verify the concentrations were estimated correctly.

Measures to Mitigate Toxic Air Quality Impacts:

If the cancer risks are found to be above the significance threshold of 10 in a million as indicated under the HRA comment above, it is recommended that the lead agency consider the following mitigation measures for implementation wherever feasible or practical:

- Restrict idling emissions by using auxiliary power units and electrification.
- Enforce truck parking restrictions.
- Improve traffic flow in the project vicinity through signal synchronization.
- Create a buffer zone of at least 1,000 feet between the proposed business park complex and sensitive receptors. Buffer zone can be employee parking or greenbelt.
- Require the use of newer, lower-emitting trucks.
- Require trucks to be properly tuned and maintained.
- Require the installation of electric hook-ups to eliminate idling of main and auxiliary engines during loading and unloading, and when trucks are not in use.

- 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.
- 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.
- Use light-colored roofing materials in construction to deflect heat away from buildings. Also use double-paned windows to reduce thermal loss.
- Install automatic lighting on/off controls and energy-efficient lighting.
- Landscape with appropriate drought-tolerant species to reduce water consumption.
- 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.

Other mitigation measures for consideration by the lead agency can be found in Chapter 11 of the Handbook.