



South Coast Air Quality Management District

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FAXED: FEBRUARY 23, 2007

February 23, 2007

Ms. Kimberlin Tran, Urban Regional Planner III
County of Riverside, Planning Department
4080 Lemon Street, 9th Floor
Riverside, CA 92502

**Draft Environmental Impact Report (Draft EIR) No. 00480 for the Proposed
Tentative Parcel Map No. 33530 and Change of Zone No. 07169 – Nuevo Business
Park**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The SCAQMD would also like to thank the lead agency for the additional time to submit comments. The following comments are meant as guidance for the Lead Agency and should be incorporated into 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 adoption of the Final Environmental Impact Report. The SCAQMD staff 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, CEQA Section
Planning, Rule Development & Area Sources

Attachment

SS:GM

RVC070109-04
Control Number

Construction Modeling

1. According to the URBEMIS2002 computer modeling output files included in Appendix B (Air Quality Impact Analysis) the lead agency performed the construction modeling analysis using an area of 203,000 square feet to estimate construction emission impacts for the proposed project. In the project description, the square footage for the light industrial development portion of the proposed development is 1,026,300 square feet. In the Final EIR, there should be a discussion supporting the use of a building area of the 203,000 square feet input as the worst-case scenario. Otherwise, the lead agency should use the larger square footage area input that more accurately reflects the worst-case construction air-quality impacts based on the project description.

Mobile Source Impacts

2. Review of the URBEMIS2002 model output file in Appendix B shows that approximately 10.6 percent of the truck trips (1,574 trips per day) are made by medium-duty trucks or heavier trucks. These categories of trucks would likely be diesel trucks. Given the nature of the project (light industrial) and the fact that the mobile source health risk assessment is based on 1,986 diesel truck trips per day, a larger percentage of the trucks should be medium-duty or heavier. In the Final EIR, please justify the use of 10.6 percent medium-duty or heavier trucks or revise the analysis to increase the percentage to be consistent with the mobile source health risk assessment.
3. In the Draft EIR (Air Quality, Traffic and Diesel Particulate Matter Impact Analyses), the lead agency discusses operational delivery truck trips, but does not include a discussion of the vehicle miles traveled used to estimate on-road mobile source emissions for the delivery trucks in the URBEMIS2002 computer model, the traffic study or the health risk assessment. Since the delivery trucks could make trips to deliver goods to the California border, the one-way trip length of 5.5 miles is low and a more reasonable truck trip delivery truck trip length is 40 miles per one-way trip. In the Final EIR, please justify this trip length or revise the analysis to include the more reasonable trip length.

Cut and Fill Emissions During Site Preparation

4. Based on the project description on page 3-5, construction activities include emissions from cut-and-fill operations that may require off-road vehicles and equipment, haul trucks to move soil to various locations at the site (the Draft EIR states that this activity will be balanced on-site), which creates PM10 fugitive dust emissions from soil disturbance. Although it appears that the lead agency has estimated soil disturbance emissions from grading five acres per day, it is not clear if the in the URBEMIS2002 computer modeling analysis includes emissions from the cut-and-fill operations. Please indicate whether or not the analysis includes emissions

from cut-and-fill operations. If not, the lead agency should revise the analysis to account for the emissions from cut-and-fill operations.

Localized Significance Thresholds

5. To evaluate localized air quality impacts, the lead agency used one approach for PM10 and a different approach for NOx and CO. For PM10, site preparation emissions were used because this phase produces the highest PM10 emissions. In addition, the analysis assumed a disturbed area of five acres. For NOx and CO, construction phase emissions were used because these were slightly higher than for site preparation. The construction phase analysis, however, assumed emissions would be spread over 63 acres. Because pollution concentration is inversely proportioned to area (i.e., lower concentrations with increasing area), performing a localized significance analysis for the construction phase may not provide a worst-case analysis. Instead, although NOx and CO emissions are slightly less for the grading phase, because the area is substantially less than for the construction phase, the site preparation phase may provide a more worst-case result. The SCAQMD, therefore, requests that the lead agency evaluate localized NOx and CO air quality impacts from the site preparation phase and report the higher of the two results in the Final EIR.

CO Hotspots Analysis

6. The traffic volumes in the CALINE4 output files do not match the traffic volumes in the Traffic Report. Information between environmental topics should be consistent. The traffic volumes in the air quality section should match the traffic volumes in the Traffic Report in the Final EIR.

Mitigation Measures for Construction Emissions

7. It is recommend that the lead agency investigate the availability of the use of lean NOx catalysts for off-road construction vehicles/equipment and demonstrate that they are available for the proposed project. Currently, the availability of this technology is relatively limited, so it may not be available for use by the project proponent. Until the lead agency can demonstrate the availability of the low emission technology, the lead agency should turn off this mitigation measure in the URBEMIS2002 computer model and not take credit for control efficiency associated with it.
8. In the event that construction air quality impacts remain significant for PM10 (fugitive dust) (see comment #5) and to further reduce NOx emissions, the SCAQMD recommends the lead agency consider implementing the following mitigation measures in addition to the measures listed in Section 4.4.4. (Mitigation Measures) on pages 4-55 and 4-56 for construction, if applicable and feasible:
 - Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow;

- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site;
- Use alternative clean fueled off-road equipment or give extra points in the bidding process for contractors committing to use such equipment;
- Use street sweepers that comply with SCAQMD Rules 1186 and 1186.1;
- Require construction equipment that meet or exceed Tier 2 standards; use emulsified diesel fuels; and equip construction equipment with particulate traps or other verified/certified technologies, etc.;
- Use electricity from power poles rather than temporary diesel or gasoline power generators;
- Reroute construction haul trucks away from congested streets or sensitive receptor areas;
- Improve traffic flow by signal synchronization;
- Construct/build with materials that do not require painting; and
- Use pre-painted construction materials.

Mitigation Measures for Operational Air Quality Impacts

9. Because project-specific operational air quality impacts from the proposed project are estimated to exceed the CO, NO_x and VOC daily significance thresholds, the SCAQMD recommends that the lead agency consider the following additional mitigation measures to further reduce project-specific operational air quality impacts from the project in conjunction with other similar projects at the business park:

Recommended Additions:

- Design the warehouse/distribution center such that when entering and exiting the facility, 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 as necessary;
- 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;
- Identify or develop secure locations outside of residential neighborhoods where truck drivers who live in the community can park their truck, such as a Park-and-Ride Lot;

- Provide food options, fueling, truck repair and or convenience store on-site to minimize the need for trucks to traverse through residential neighborhoods; and
- Conduct air quality monitoring at sensitive receptors.

Health Risk Assessment

10. Diesel truck activity for the western area of the proposed project was added to the air dispersion model through the emission factor for hour of day (1,443 trucks per day over 12 hours, which is 120.25 trucks per hour). From the Excel files included in the HRA it appears that the diesel truck activity for the eastern area of the proposed project (543 trucks per day, which is 45.25 per hour) was meant to be included in the air dispersion model. However, it appears that the eastern truck activity was inadvertently left out. The Final EA/HRA should account for the total diesel truck activity.

11. The travel distance/time and idling time for the proposed project was divided by location (western and eastern section of the proposed project), and then by operation (parking, loading/unloading, and egress). The total idling time for each side is seven minutes per hour per truck. Five minutes is the maximum time allowed by state regulation for a single idling event. Since trucks may idle at an entrance gate, while waiting for a loading dock, at the loading dock before loading, at the loading dock after loading and again before checking out; SCAQMD staff believes that each diesel truck would idle at least 15 minutes on-site.

If the lead agency continues to use the seven minute idle per trip, then a seven minute idle per trip restriction should be added as a mitigation measure or as a condition in the land use permit. The Final EIR should either include 15 minutes of idling per trip or a mitigation measure or a statement that says that a seven minute idle restriction will be placed into the land use permit condition.

11. Health risk assessment was completed according to OEHHA's cancer potency methodology recommended by SCAQMD staff. A breathing rate of 20 cubic meters per day with a body weight of 70 kilograms (285.7 liters per kilogram-day). SCAQMD staff requires that risk assessments use the use the ARB breathing rate of 302 liters per kilogram-day or greater for HRAs. Guidance on the ARB breathing rate can be found at <http://www.arb.ca.gov/ab2588/riskassess.htm>.

12. The HRA does not include the use of TRUs. TRUs would be allowed by the project. The Final HRA should include an analysis that includes the use of TRUs.