



# South Coast Air Quality Management District

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

**FAXED: MARCH 16, 2007**

March 16, 2007

Ms. Diane Sbardellati  
City of Perris  
Planning Division  
135 North "D" Street  
Perris, CA 92570

Dear Ms. Sbardellati:

**Draft Environmental Impact Report (DEIR)**  
**Overton Industrial Project**  
January 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

RVC070130-01  
Control Number

**Draft Environmental Impact Report (DEIR)**  
**Overton Moore Industrial Project**

**General Comment:**

*The Air Quality Analysis and Health Risk Assessment* circulated with the DEIR is dated March 9, 2006, Revised April 25, 2006 (AQAHRA, April 2006). When SCAQMD staff requested an electronic version of the Health Risk Assessment for review, SCAQMD staff was sent a different report with the same title but a different date, *Air Quality Analysis and Health Risk Assessment* dated November 15, 2006 (AQAHRA, November 2006). It appears that the data and conclusions presented in the text of the DEIR are based on the AQAHRA, November 2006. In the Final EIR, the lead agency should confirm that the November 2006 document is the correct version of the AQAHRA and if this is the case include only the AQAHRA, November 2006 to avoid confusion.

**Truck Emissions:**

Truck emissions for the proposed project appear to be underestimated for the following reason. Table 4.2-4 on page 4.2-12 of the DEIR shows that trucks comprise approximately 70 percent of projected vehicle traffic, i.e., 615 out of a total of 886 vehicles. Based on the proposed land use and similar projects, this proportion of trucks, primarily heavy-duty diesel delivery trucks, would be appropriate. However, in estimating vehicle emissions, the lead agency on page 28 of AQAHRA, states that the URBEMIS default fleet mix was changed to represent the distribution in the traffic study. The lead agency states that the percent truck trips was changed to 48 percent (total trucks per day divided by total vehicles = 245/515). Clearly, the percent trucks and total number of vehicles in the AQAHRA and URBEMIS model output are less than the percent trucks and total number of vehicles from the traffic study. Please revise the AQAHRA and rerun the URBEMIS model to more accurately reflect the traffic study. This will require modifying the operational emissions in Table 4.3-6 of the DEIR and Table 6 in the AQAHRA.

**Air Quality Analysis and Health Risk Assessment**

- Carcinogenic health risks were estimated by multiplying the toxic concentrations by the unit risk factor and lifetime exposure adjustment. For future projects, the carcinogenic health risk should be estimated by using the cancer potency factors instead of the unit risk factor.
- The Air Quality Analysis and Health Risk Assessment document and the DEIR both state that truck idling shall be prohibited onsite. Since some idling is inherent in diesel truck travel, it is unclear how the lead agency or project proponent would prohibit idling.

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, the Final EIR should demonstrate how diesel truck operations can occur without any truck idling on-site. In addition, the Final EIR should include a description of how the prohibition would be enforced.

Since the HRA is based on five minutes of idling, if idling is allowed it should be restricted to five minutes or the HRA should be revised to analyze the longer time period.

### **Operational NO<sub>x</sub> Emissions:**

There are several problems with the operational emissions shown in Table 3-5 on page 4.3-25. First, the significance threshold for NO<sub>x</sub> is incorrectly listed as 550 pounds per day instead of the recommended 55 pounds per day. For this reason operational NO<sub>x</sub> emissions of 92.75 pounds per day are concluded to be less than significant. However, operational emissions in Table 4.3-5 appear to be inconsistent with the operational emissions in Table 6 of the AQAHRA and the operational emissions reported in the URBEMIS output tables in Appendix A. Finally, as indicated in a previous comment, truck emissions in the URBEMIS output sheets in Appendix A appear to be underestimated. The lead agency needs to reconcile these conflicting results in the Final EIR.

If the revised analysis shows that NO<sub>x</sub> emissions continue to exceed the appropriate daily significance threshold, SCAQMD staff recommends the following measures to be considered by the lead agency where feasible:

- Require that trucks use alternative clean fuel such as compressed natural gas. However, where diesel trucks have to be used, have trucks use particulate filters, oxidation catalysts, and low sulfur diesel, as defined in SCAQMD Rule 431.2, i.e., diesel with less than 15 ppm sulfur content.
- 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.

- 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.
- Use light-colored roofing materials in addition to the skylights mentioned on page 4.3-26 of the DEIR in construction to deflect heat away from buildings.
- Install automatic lighting on/off controls and energy-efficient lighting.
- 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.

### **CO Hotspot Analysis**

- Receptors are placed within the mixing zone of the roadways. Receptors should be placed three meters from the roadway edge pursuant to the Caltrans, Transportation Project-Level Carbon Monoxide Protocol (CO Protocol, revised December 1997). The CO protocol can be downloaded from <http://www.dot.ca.gov/hq/env/air/index.htm>. The Final EIR should contain a CO hotspots analysis that follows the CO Protocol.
- All of the road widths in the CALINE4 model runs are 10 meters. Based on Figure 3-1, it appears that some road sections are wider than a single lane. Road geometry in the Final EIR CO analysis should reflect actual road dimensions.

### **Construction Localized Significance Threshold (LST) Analysis**

On page 4.3-20 of the DEIR the lead agency states that because disturbed acreage during construction is approximately 5.3 acres, based on the URBEMIS defaults, the lead agency will use the construction LSTs for a five-acre project. In this situation, the SCAQMD requests that the lead agency add a mitigation measure to limit disturbed acreage during construction to five acres or less.