



South Coast  
Air Quality Management District

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September 19, 2008

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City of Moreno Valley  
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Moreno Valley , Ca 92553

**Review of the Draft Environmental Impact Report (Draft EIR) for the Proposed  
Highland Fairview Corporate Park**

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 into either a Revised Draft or Final Environmental Impact Report (Final EIR) as appropriate.

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 EIR. The SCAQMD staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,

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

Attachment

SN:SS:DG

RVC080807-03  
Control Number

## **CEQA General**

### **Project Description:**

1. The project is described in Section 2 and Section 3 of the Draft EIR to include a total area of 265.3 acres, which consists of 158.4 acres designated as the project-site, 83.5 acres designated as a downstream drainage study area, and 23.4 acres designated as an area for various offsite infrastructure improvements. The project description does not identify the relationship between the project site, including the offsite infrastructure improvements, and the downstream drainage study area. Also, it is not clear from the project description whether the downstream drainage study area will require activity that may potentially generate air pollutants. The project description should be revised to supply enough detail to fully evaluate the potential impacts from the proposed project.

### **Air Quality Analysis and Mitigation Measures:**

#### **General**

2. The Project Description (Section 3.1) of the Draft EIR indicates that existing residential uses are located at approximately 0.25 mile southwest and southeast of the project site. Also, the Land Use and Planning (Section 5.9) of the Draft EIR indicates that the existing General Plan designations surround the southern portion of the project site within one-quarter mile of sensitive receptors that include zoning for residential uses and a middle school.

The Lead Agency conducted an air quality analysis of localized air quality impacts and a health risk assessment to determine the projects exposure of sensitive receptors to substantial pollutant concentrations. The results of these analysis indicated that construction air quality impacts exceeded the SCAQMD's recommended localized significance thresholds and operation of the project would generate significant cancer risk impacts. Based on these results the lead agency identified a number of air quality mitigation measures, including MM AQ-11 through MM AQ-13.

The lead agency relies on MM AQ-13 to reduce localized PM impacts, although localized PM10 impacts remain significant, and to reduce significant cancer risk impacts to less than significant the SCAQMD recommends that MM AQ-13 is enhanced so that it specifies the conditions for approval of the General Plan Amendment, Change of Zone, Tentative Parcel Map and Plot Plan to preclude the establishment of residential and sensitive receptors of at least 500 feet from the property line.

3. The SCAQMD recommends that overlapping construction and operation emissions should be summed and compared to the applicable operational significance threshold.

On page 5.3-28 and again on page 5.3-43 the lead agency states that phase 2 construction emissions would overlap with phase 1 operations. Also, construction of phase 3 overlaps with phase 2 operations. The analysis should have evaluated overlapping emissions from the construction of phase 3 and operations of both phase 1 and 2. The Final EIR should reflect all overlapping emissions during the construction of phase 3.

Tables 5.3-22, 5.3-23, 5.3-29, and 5.3-30, and 5.3-31 show overlapping construction and operation emissions or operational emissions from the various phases. In all tables the results for VOC and NO<sub>x</sub> Construction significance thresholds respectively. In the case of overlapping construction and operation emissions the results should be compared to the operational significance threshold which is 55 pounds per day for both VOC and NO<sub>x</sub> emissions. Similarly, operational emissions should be compared to the applicable operational significance thresholds. Therefore, the tables should be revised to reflect the correct significance thresholds and, if necessary, modify significance determinations as necessary.

Table 5.3-10 on page 5.3-30 shows vehicle trips projected for the proposed project. The middle column shows average daily trips. To account for maximum impacts from the proposed project peak daily vehicle trips should be analyzed.

#### Air Quality Standards/Violations and Applicable Mitigation (Impact 5.3-2)

5. Even after identifying mitigation measures to reduce significant adverse localized PM emissions during construction, PM<sub>10</sub> construction air quality impacts remain significant. Therefore, in addition to MM AQ-1 through AQ-10, SCAQMD staff recommends that the lead agency consider requiring the measures below to further mitigate PM<sub>10</sub> emissions.
  - Alternative fueled off-road equipment or giving additional points in the job bidding process to contractors who commit to using alternative fueled off-road equipment.
  - All streets shall be swept at least once a day using SCAQMD Rule 1186 certified street sweepers or roadway washing trucks if visible soil materials are carried to adjacent streets (recommend water sweepers with reclaimed water); July 2, 2008
  - Configure construction parking to minimize traffic interference.
  - 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.
  - 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 and sensitive receptor areas;
  - Improve traffic flow by signal synchronization; and

In addition to the above measures, SCAQMD staff recommends modifying existing mitigation measures as follows.

MMAQ-2 All diesel powered construction equipment in use shall require control equipment that meets at a minimum Tier III emission requirements. In the event Tier III equipment is not available, diesel powered construction equipment in use shall require emissions control equipment with minimum of Tier II dies standards.

MMA-4 During project construction, the developer shall require all contractors to turn off all construction equipment and delivery vehicles when not in use or prohibit idling in excess of 5 minutes.

#### Regional Significance and Cumulative Impacts (Impact 5.3-3) and Applicable Mitigation

6. In the Regional Operational Assessment for Impact 5.3-3 the Lead Agency indicated that an average weighted trip length was assumed, however, the methodology for deriving this average is not provided in the Draft EIR. The SCAQMD recommends that the methodology for the average weighted trip length be provided in the Air Quality Appendix.
7. The regional significance threshold assessment yields a significant and unavoidable impact and offers limited mitigation related to operational activities for the project which primarily address on-site emissions reductions. The SCAQMD recommends the lead agency consider the following additional mitigation measures to reduce diesel emissions which contribute to the projects overall impact:
  - Re-route truck traffic by adding direct off-ramps for the truck traffic or by restricting truck traffic on certain sensitive routes;
  - Improve traffic flow by signal synchronization;
  - Enforce truck parking or idling restrictions;
  - Develop park and ride programs;
  - Restrict operation to “clean” trucks, such as a 2007 or newer model year or 2010 compliant vehicle;
  - Electrify service equipment facility;
  - Electrify auxiliary power units;
  - Use “clean” street sweepers compliant with SCAQMD Rule 1186.1;
  - Pave road and road shoulders;
  - Provide onsite services to minimize truck traffic in or near residential areas, including, but not limited to, the following services: meal or cafeteria service, automated teller machines, etc.;
  - Require or provide incentives to use CARB certified particulate traps that meet level 3 requirements;

8. It is recommended that the lead agency consider the following mitigation measures to further reduce operational and cumulative operational air quality impacts from the proposed business park project:

- 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.
- 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 for particulate traps that meet CARB certified level 3 requirements;
- Electrify service equipment at facility;
- Conduct air quality monitoring at sensitive receptors.

### **Rules and Regulations**

9. In addition to the rules cited in Section 5.3 – Air Quality on pages 5.3-11 and 5.3-12, the SCAQMD recommends adding the following SCAQMD rules and regulations to the Draft EIR:

- Rule 1186 – PM10 emissions from Paved and Unpaved Roads, and Livestock Operations; and
- Rule 1186.1 – Less Polluting Sweepers.