



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Revised Focused Draft Environmental Impact Report (RFDEIR) for the Proposed Plot Plan No. 25422 – Alessandro Commerce Centre Revised Focus EIR

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 the Final CEQA document.

In April 2010, the County of Riverside (County) certified Environmental Impact Report 510 (Original EIR) for the development of Alessandro Commerce Center project and approved Tentative Parcel Map No. 35365 and Plot Plan 22925. The Original EIR was subsequently successfully challenged and a settlement agreement was entered into to settle this lawsuit. Subsequent to the court decision, a Revised Project was submitted to the County to be incorporated into a Revised Focused Draft Environmental Impact Report (RFDEIR) that would address both the direction from the court on the Original EIR and impacts of the new Revised Project.

In the project description, the lead agency proposes the construction of two buildings for warehouse distribution and office space uses totaling approximately 814,630 square feet on a 54 acre site. Based on traffic studies from the Original Project, the lead agency projects 779 daily truck trips operating at the site. In the Air Quality Section, the lead agency quantified the project's construction and operation air quality impacts and has compared those impacts with the SCAQMD's recommended regional and localized daily significance thresholds. Based on its analyses, the lead agency has determined that operational air quality impacts will exceed the recommended regional daily significance threshold for NO_x.

The SCAQMD staff has concerns regarding the assumptions used in the air quality analysis, specifically the construction and operational portion of the CalEEMod land use model. It is unclear how the lead agency determined the construction and operational emissions. The lead agency should provide additional information and documentation to justify construction activities, truck trips, and truck fleet mixes as well as providing output files. Additionally, since the proposed project will result in significant NO_x impacts, all feasible mitigation measures should be included in the Final CEQA document to further reduce the significant impacts. Details are included in the attachment.

Pursuant to Public Resources Code Section 21092.5, SCAQMD staff requests that the lead agency 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 air quality questions that may arise. Please contact Jack Cheng, Air Quality Specialist CEQA Section, at (909) 396-2448, if you have any questions regarding the enclosed comments.

Sincerely,

Jillian Wong

Jillian Wong, Ph.D.
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Planning, Rule Development & Area Sources

Attachment
JW:JC
RVC150814-04
Control Number

Attachment

General Comments

1. Sufficient information should be included to understand the assumptions used in the air quality analyses for regional and localized emission impacts. For example, the following should be included based on the project description: the estimated construction start and completion dates; the amount of debris demolition, the number of daily haul trips and approximately distance(s) to the disposal site(s) should be disclosed; the amount of soil export, the soil disposal destination site(s) distance(s), number of daily haul trips; a construction equipment list (e.g., numbers, types of construction equipment, hours of operation per day, etc.) should also be included in the Final EIR document. These assumptions can be included in the narration, table(s), footnotes, as an appendix, or included with the modeling output sheets.

Health Risk Assessment (HRA) and Localized Significance Threshold (LST) Analysis

2. The American Meteorological Society/Environmental Protection Agency Regulatory Model Improvement Committee (AERMIC) was formed to introduce state-of-the-art modeling concepts into the EPA's air quality models. Through AERMIC, a modeling system, AERMOD, was introduced that incorporated air dispersion based on planetary boundary layer turbulence structure and scaling concepts, including treatment of both surface and elevated sources, and both simple and complex terrain. As of December 9, 2006, AERMOD is fully promulgated as a replacement to ISC3, in accordance with [Appendix W \(http://www.epa.gov/ttn/scram/dispersion_prefrec.htm\)](http://www.epa.gov/ttn/scram/dispersion_prefrec.htm). AERMOD is a steady-state plume model that incorporates air dispersion based on planetary boundary layer turbulence structure and scaling concepts, including treatment of both surface and elevated sources, and both simple and complex terrain. The lead agency used SCREEN3 to prepare the dispersion modeling for the HRA. Therefore, SCAQMD staff recommends that the lead agency revise the HRA analysis using the latest version of AERMOD (version 15181). SCAQMD's modeling guidance for AERMOD can be found at <http://www.aqmd.gov/home/library/air-quality-data-studies/meteorological-data/modeling-guidance>. Please note that when using AERMOD, the regulatory default option should be used (i.e. without the use of the "FASTALL" or "FLAT" options). If the lead agency wishes to use the FASTALL option or any other regulatory non-default options, SCAQMD staff should be consulted prior to the start of modeling.

Air Quality Analysis - Operations

3. Based on a review of the project's emissions calculations in Appendix C-5: CalEEMod Input Parameters, the lead agency determined the proposed Project's air quality impacts using emission factors for unrefrigerated warehouses/truck activity. Since the future tenant is unknown, SCAQMD staff recommends that the lead agency include a mitigation measure that precludes the use of refrigerated warehousing at the Project site or revise the air quality analysis to account for emissions from refrigerated warehouse uses.

Construction Mitigation Measures for Reducing NOx emissions

4. SCAQMD staff recommends that AQ-1a be replaced with the following construction Mitigation Measures:
 - All off-road diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

- Alternatively, the Lead Agency could rely on the Green Construction Policy¹ used by LA County Metro or the ports of Los Angeles/Long Beach. These policies include provisions to ‘step down’ from Tier 4 equipment to Tier 3 or Tier 2 if specified criteria are met.
- Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export) and if the lead agency determines that 2010 model year or newer diesel trucks cannot be obtained, the lead agency shall use trucks that meet EPA 2007 model year NOx emissions requirements.
- A copy of each unit’s certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.
- Require the use of electricity from power poles rather than temporary diesel or gasoline power generators.
- Provide temporary traffic controls such as a flag person, during all phases of significant construction activity to maintain smooth traffic flow.
- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site.
- Reroute construction trucks away from congested streets or sensitive receptor areas.
- Improve traffic flow by signal synchronization.

Mitigation Measures for Operational Air Quality Impacts (Mobile Sources)

5. During project operations, the Lead Agency has determined that project operation emissions are significant for Volatile Organic Compounds (VOC) and Oxides of Nitrogen (NOx), Carbon Monoxide (CO), Particulate Matter (PM10) and PM2.5, primarily from on-road mobile sources including truck activity emissions. The SCAQMD staff therefore recommends the following change and additional measures that should be incorporated into the Final EIR to reduce exposure to sensitive receptors and reduce project air quality impacts:

Additional Mitigation Measures:

- Require the use of 2010 compliant diesel trucks, or alternatively fueled, delivery trucks (e.g., food, retail and vendor supply delivery trucks) at commercial/retail sites upon project build-out. If this isn’t feasible, consider other measures such as incentives, phase-in schedules for clean trucks, etc.
- Provide minimum buffer zone of 300 meters (approximately 1,000 feet) between truck traffic and sensitive receptors based on guidance from the California Air Resource Board (CARB) guidance.²
- Limit the daily number of trucks allowed at each facility to levels analyzed in the Final EIR. If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the project through CEQA prior to allowing this higher activity level.
- Design the site such that any check-in point for trucks is well inside the facility to ensure that there are no trucks queuing outside of the facility.
- On-site equipment should be alternative fueled.
- Provide food options, fueling, truck repair and or convenience stores on-site to minimize the need for trucks to traverse through residential neighborhoods.
- Improve traffic flow by signal synchronization.
- Have truck routes clearly marked with trailblazer signs, so that trucks will not enter residential areas.
- Because the proposed Project generates significant regional emissions, the lead agency should require mitigation that requires accelerated phase-in for non-diesel powered trucks. For example, natural gas

¹ Los Angeles County Metropolitan Transportation Authority, July 21, 2011: <http://www.metro.net/about/search/?q=green%20construction%20policy>

² CARB: Air Quality and Land Use Handbook: A Community Health Perspective, April 2005, Page4 for Distribution Centers.

trucks, including Class 8 HHD trucks, are commercially available today. Natural gas trucks can provide a substantial reduction in health risks, and may be more financially feasible today due to reduced fuel costs compared to diesel. In the Final CEQA document, the Lead Agency should require a phase-in schedule for these cleaner operating trucks to reduce project impacts. SCAQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency and project applicant.

- At a minimum, require upon occupancy that do not already operate 2007 and newer trucks to apply in good faith for funding to replace/retrofit their trucks, such as Carl Moyer, VIP, Prop 1B, or other similar funds. Should funds be awarded, the occupant should also be required to accept and use them.

Electric Vehicle (EV) Charging Stations

6. Trucks that can operate at least partially on electricity have the ability to substantially reduce the significant NOx impacts from this project. Further, trucks that run at least partially on electricity are projected to become available during the life of the project as discussed in the 2012 Regional Transportation Plan. It is important to make this electrical infrastructure available when the project is built so that it is ready when this technology becomes commercially available. The cost of installing electrical charging equipment onsite is significantly cheaper if completed when the project is built compared to retrofitting an existing building. Therefore, the SCAQMD staff recommends the lead agency require the proposed facility and other plan areas that allow truck parking to be constructed with the appropriate infrastructure to facilitate sufficient electric charging for trucks to plug-in. Similar to the City of Los Angeles requirements for all new projects, the SCAQMD staff recommends that the Lead Agency require at least 5% of all vehicle parking spaces (including for trucks) include EV charging stations.³ Further, electrical hookups should be provided at the onsite truck stop for truckers to plug in any onboard auxiliary equipment. At a minimum, electrical panels should appropriately sized to allow for future expanded use.

³ http://ladbs.org/LADBSWeb/LADBS_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf