



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178

(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL AND USPS:

pbrenes@riversideca.gov

October 5, 2016

Ms. Patricia Brenes, Principal Planner
City of Riverside – Planning Division
3900 Main St., 3rd Floor
Riverside, CA 92522

Draft Environmental Impact Report (DEIR) for the Proposed Sycamore Canyon Business Park Buildings 1 and 2 Project

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 EIR.

In the project description, the Lead Agency proposes the construction of two buildings for warehouse distribution and office space uses totaling approximately 1,433,599 square feet on an 80 acre site. Based on the Project's traffic study, the Project will result in 917 daily trucks 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.

On August 28, 2015, SCAQMD staff provided comments to the Lead Agency on the Notice of Preparation, which included guidance and recommendations on performing a Health Risk Assessment (HRA). However, in the DEIR, the HRA did not follow the SCAQMD's recommended methodology and SCAQMD staff has concerns that the HRA underestimated emissions and health risks to the surrounding residents. Additionally, since the proposed project will result in significant NO_x impacts, all feasible mitigation measures should be included in the Final EIR 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 Gordon Mize, Air Quality Specialist CEQA Section, at (909) 396-3302, if you have any questions regarding the enclosed comments.

Sincerely,

Jillian Wong

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

Attachment
JW:GM:JC
RVC160811-02
Control Number

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

1. As indicated in our comment letter on the Notice of Preparation/Initial Study dated August 28, 2015, SCAQMD recommends the Lead Agency revise the HRA by using the guidance provided in the *Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*:
<http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.
2. The Lead Agency used AERSCREEN (version 15181) to conduct a screening level health risk assessment and stated that the assessment is conservative. However, a screening level assessment is inappropriate here and likely not conservative due to the modeling complexity of the proposed project (idling at loading bays, on-site travel, and truck routes) and the location of sensitive receptors. AERSCREEN is intended for a single emission source and not for multiple emission sources. The proposed project has several non-uniform emissions throughout the site that should not be generalized as a single volume source. SCAQMD staff recommends using AERMOD to properly model individual emission sources, discrete receptor locations, wind data, and terrain data.
3. The Lead Agency used a single 8.92 acre volume source placed in the center of the site to represent all project emissions. However, truck idling, on-site travel, and truck route emissions should be modeled as separate emission sources with individual emission rates to accurately reflect the emission profile of the proposed project. The SCAQMD staff recommends using multiple line sources or smaller volume sources as well as specific emission rates to represent loading docks and travel routes. Receptors should also be placed along the fence line to estimate risks to the adjacent sensitive receptors. Due to the proximity of adjacent sensitive receptors, care should be taken to ensure that no receptors are placed within the volume source exclusion zone.
4. The Lead Agency used an average composite distance (450 meters) to determine emission concentrations at receptor locations. The average composite distance was derived by averaging the distances from the centroid of each volume source (eight zones) to the closest sensitive receptor of each zone. The composite distance is not conservative and underestimates impacts to receptors closest to the proposed project (residential receptors immediately adjacent to the north and west). The proposed site plan indicates that truck loading docks are located along the western edge of the project site and closer to receptors than the average composite distance. Furthermore, the average composite distance and methodology used is inconsistent with the *Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis* and does not accurately represent the proposed project. SCAQMD staff recommends that the Lead Agency revise the model and health risks using the recommended guidelines.
5. On-site Heavy Duty Truck emissions were based on CalEEMod's operational emission calculations. CalEEMod uses emissions data from aggregated vehicle speeds typically found on highway travel. The HRA does not account for vehicles idling or traveling at low speeds, which generate greater emissions and therefore underestimates health risks. SCAQMD staff recommends incorporating 15 minutes idling and on-site travel (low speed travel – 5-10 mph) emissions into the revised HRA and recalculate the health risks.
6. The Lead Agency failed to include emissions from truck routes along local roads in the HRA, which underestimates health risk impacts. Roadways used by project-generated trucks should be modeled from the project site to where the trucks enter the freeway. SCAQMD staff recommends revising the HRA to include roadways used for truck travel.

Mobile Source Operational Mitigation Measures

7. Because the Lead Agency has determined that operational emissions exceed the SCAQMD recommended level of significance for Oxides of Nitrogen (NOx), mainly from truck operations, SCAQMD staff recommends the following mitigation measures in addition to the measures included in the Draft EIR starting on page 5.3-35 in order to reduce these significant operational impacts:

Recommended additions – Truck Activities

- 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 and 2016 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 warehouse 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.
- Consistent with the advisory recommendations from the California Air Resources Board's Land Use Handbook^[1] provide minimum buffer zone of 1,000 feet between truck traffic and sensitive receptors if significant health risk impacts are determined by a project specific HRA.
- Limit the daily number of trucks allowed at each facility to levels analyzed in the Final SEIR. 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.
- 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^[2].
- Have truck routes clearly marked with trailblazer signs, so trucks will not enter residential areas or restricted routes.

^[1] CARB Air Quality and Land Use Handbook, April 2005, Page 4. <http://www.aqmd.gov/docs/default-source/ceqa/handbook/california-air-resources-board-air-quality-and-land-use-handbook-a-community-health-perspective.pdf>

^[2] http://ladbs.org/LADBSWeb/LADBS_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf.