



# South Coast Air Quality Management District

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## **Review of the Draft Environmental Impact Report (Draft EIR) for the Proposed Alessandro Commerce Centre**

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.

The project description is inconsistent in the Executive Summary, Chapter 3 Project Description, and Chapter 4 Air Quality. The Draft EIR should present an accurate project description that is consistent throughout the Draft EIR. According to *County of Inyo v. City of Los Angeles* (3d Dist. 1977) 71 Cal. App. 3d 185, 193 “an accurate, stable and finite project description is the *sine qua non* of an informative and legally sufficient EIR.” Therefore, the SCAQMD staff requests that the lead agency revise the project description to be consistent throughout the Draft EIR and fully evaluate the potential impacts from the proposed project.

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 has provided detailed comments in the following attachment and 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

SS:DG

RVC090122-06  
Control Number

**CEQA General**

1. The Project Description (Section 3.3.2) in the Draft EIR includes 720,000 square feet of building space, 974,727 square feet of landscaping area and 1,784 parking spaces. However, in Section 4.3.5 of the Draft EIR the air quality impacts and mitigation measures are based on 3,299,000 square feet of building space and infrastructure improvements. The project description should be revised to be consistent throughout the Draft EIR and fully evaluate the potential impacts from the proposed project.

**Air Quality Analysis and Mitigation Measures:**

2. In Section 4.3.5 (Air Quality-Project Impacts and Mitigation Measures) of the Draft EIR the lead agency assesses the regional significance thresholds for the project's construction and operational activities. The lead agency summarizes the project's regional construction and operational emissions in Tables 4.3-5 through 4.3-8, however, the results in these tables do not reflect the emissions values on the URBEMIS 2007 output sheets provided in Appendix A and Appendix B of the Air Quality Analysis Report. Also, the phase assumptions described in the URBEMIS 2007 output sheets do not reflect the project description, for example, the phase assumptions for mass grading and fine grading specify that 20.72 acres of the site will be disturbed as opposed to the 51.21 acres described in the project description.

AQMD Staff requests that the lead agency revise the air quality analysis using inputs for the URBEMIS 2007 Model consistent with the project description. Once the air quality analysis has been revised the SCAQMD staff requests that the lead agency revise the draft EIR quantifying peak daily air quality impacts and summarizing all emissions (i.e. NO<sub>x</sub>, SO<sub>x</sub>, CO, PM<sub>10</sub>, PM 2.5 and ROG) from the planned construction and operational activities including; cut-and-fill operations, grading, and on-road and off-road mobile sources.

In the event that the lead agency's revised regional air quality analysis demonstrates that any criteria pollutant emissions exceed the SCAQMD's daily significance thresholds, the SCAQMD recommends that the lead agency consider adding the following mitigation measures to further reduce air quality impacts from the construction phase of the project, if feasible:

**NO<sub>x</sub>:**

- Prohibit vehicle and engine idling in excess of five minutes and ensure that all off-road equipment is compliant with the California Air Resources Board's (CARB) in-use off-road diesel vehicle regulation and SCAQMD Rule 2449,
- Require the use of alternative fueled off-road construction equipment,
- Require the use of electricity from power poles rather than temporary diesel or gasoline power generators,
- Develop park and ride programs,

- Electrify service equipment facility,
- Electrify auxiliary power units,
- 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, and
- Restrict operation to “clean” trucks, such as a 2007 or newer model year or 2010 compliant vehicle.

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

- MM-AQ-1a: All diesel-powered construction equipment ~~in use in excess of 50 horsepower shall required emission control~~ be equipped with a minimum of Tier III ~~diesel particulate filter~~ emission controls ~~resulting in a minimum of 50 percent particulate matter control.~~
- MM-AQ-1d: Prior to project construction the project proponent will provide a traffic control plan that will require:
  - Require construction parking to be configured such that traffic interference is minimized,
  - 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 hours to the extent practicable,
  - Reroute construction trucks away from congested streets or sensitive receptor areas, and
  - Improve traffic flow by signal synchronization

~~describe in detail safe detours around the project construction site and provide temporary traffic control (i.e. flag person) during demolition debris transport and other construction related truck hauling activities.~~

#### Fugitive Dust:

- Require the application of non-toxic soil stabilizers according to manufacturers’ specifications to all inactive construction areas (previously graded areas inactive for ten days or more),
- Require all trucks hauling dirt, sand, soil, or other loose materials to be covered,
- Suspend all excavating and grading operations when wind gusts (as instantaneous gusts) exceed 25 mph,
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation,

- When sweeping streets to remove visible soil materials use SCAQMD Rule 1186 and 1186.1 certified street sweepers or roadway washing trucks,
- Pave road and road shoulders, and
- Replace ground cover in disturbed areas as quickly as possible.

#### VOC

- Construct or build with materials that do not require painting, and
- Require the use of pre-painted construction materials.

For additional measures to reduce off-road construction equipment emissions, refer to the mitigation measure tables located at the following website:

[www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html).

3. The lead agency conducted an air quality analysis of localized air quality impacts to determine the projects exposure of sensitive receptors to substantial pollutant concentrations during the construction phase of the project. However, the results of the analysis provided in Table 4.3-13 do not reflect the URBEMIS 2007 output sheets provided in Appendix B of the Air Quality Analysis Report. The results summarized in Table 4.3-13 indicate the project's air quality impacts exceed the SCAQMD's recommended localized significance thresholds for construction emissions from PM10 and PM2.5. Based on these results the lead agency identified a number of air quality mitigation measures, including MM-AQ-1a through MM-AQ-1j.

The lead agency relies on mitigation measures MM-AQ-1a through MM-AQ-1j to reduce localized PM impacts, although localized PM10 and PM2.5 impacts remain significant. To reduce adverse localized PM10 and PM 2.5 emissions during construction the SCAQMD recommends that mitigation measures MM-AQ-1a through MM-AQ-1j are enhanced to include the NOx and fugitive dust mitigations measures provided in Comment #2.

4. The lead agency also conducted a Health Risk Assessment to determine the projects exposure of sensitive receptors to substantial pollutant concentrations during operation of the project. The cancer risk impacts determined by the Health Risk Assessment are in-part based on the diesel particulate emissions from diesel-fueled vehicles traveling and idling on the project site. These diesel particulate emissions may be underestimated because the total number of diesel trips estimated for the project in the Traffic Impact Analysis (Appendix I) is greater than the total number of trips used in the Health Risk Assessment to determine cancer risk impacts. SCAQMD staff requests that the lead agency revise the HRA to be consistent with the vehicle fleet mix and trip generation rate identified in Traffic Impact Analysis.

In the event that the lead agency's revised Health Risk Assessment requested in this comment demonstrate that operation of the project would generate significant cancer risk impacts. The SCAQMD recommends that the lead agency consider adding the following mitigation measures to further reduce air quality impacts from the operation phase of the project, if feasible:

- Avoid siting new sensitive land uses within 1,000 feet of the warehouse/distribution center,
- 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, and
- Conduct air quality monitoring at sensitive receptors.