South Coast
Air Quality Management District
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135 North "D" Street
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Draft Environmental Impact Report (Draft EIR)
for the Proposed South Perris Commerce Center (SCH No. 2008071060)

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 Environmental Impact Report (Final EIR).

The proposed project is by far the largest warehouse distribution project that the SCAQMD staff has reviewed. A project of this magnitude must be carefully planned to ensure that the surrounding existing and future land uses where residents and sensitive receptors are located are not adversely impacted. The SCAQMD staff recommends that the lead agency applies siting recommendations in the California Air Resources Board's "Air Quality and Land Use Handbook" and implement measures in the Western Riverside Council of Governments (WRCOG) "Good Neighbor Guidelines for Siting New and/or Modified Warehouse/Distribution Facilities."

The findings in the Draft EIR show that the proposed project will result in significant air quality impacts. In the event that a project generates significant adverse air quality impacts, CEQA requires that the lead agency consider all feasible mitigation measures that go beyond what is required by law to be utilized during project operation to minimize or eliminate significant adverse air quality impacts (CEQA Guidelines Section 15126.4 (b)). The SCAQMD staff is concerned that mitigation measures proposed in the Draft EIR do not represent all feasible mitigation measures. Therefore, the SCAQMD staff recommends that the lead agency consider the proposed mitigation measures changes and/or additions contained in the attachment to further reduce operational air quality and health impacts of the proposed project and include them in the Final EIR.

In addition, the SCAQMD staff has identified several inconsistencies in the air quality impact analysis and health risk assessment and are concerned that these may lead to an under estimate of the impacts. The inconsistencies are discussed in the following attachment. Further, staff is available to work with the lead agency to address these issues and any other questions that may arise.

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. Please contact Gordon Mize, Air Quality Specialist CEQA Section, at (909) 396-3302, if you have any questions regarding the enclosed comments.

Sincerely,

Susan Nakamura
Manager
Planning, Rule Development & Area Sources

Attachment

SS:EE:JK:GM

RVC091021-02
Control Number

Health Risk Assessment

1. The health risk assessment was developed on a diesel truck trip rate of 1,042 (111 diesel truck trips to Site 1, 485 diesel truck trips to Site 2 and 446 diesel truck trips to Site3) from Appendix C of the HRA. Table 4.11.L. of the Draft EIR presents 259 net truck trips PCE for Site 1, 1,135 net truck trips PCE for Site 2, and 1,049 net truck trips PCE for Site 3 for a total of 2,443 net truck trips PCE. It is unclear if the number of diesel truck trips used in the HRA is consistent with the traffic report. The Final EIR and HRA should detail how the truck trips used in the HRA were developed from the Traffic Report. Depending on the outcome of this clarification, the health risk due to truck traffic may be underestimated by as much as 50%.

Air Quality Analysis

2. In the Air Quality Impact Analysis (AQIA), the lead agency estimated on-site rail emissions but did not provide an explanation of the methodology used. The SCAQMD staff recommends including a description of the methodology used to calculate train emissions in the Final EIR. In addition, the AQIA does not include any estimate for off-site train emissions that would occur from rail traffic to and from the facility. The Final EIR should include off-site rail emissions out to the border of California.

3. The SCAQMD staff is concerned that emissions from truck trips may have been underestimated. In the URBEMIS2007 computer model output sheets in the AQIA, the percentage of trucks used to estimate operational truck emissions totals was 20.4 percent. However, when this percentage is multiplied with the total number of trips for each model run for the three separate site phases, the number of truck trips is less than the number of estimated truck trips in Table 4.11.L in the Traffic and Circulation section of the Draft EIR. For example, 227 daily truck trips are estimated in the URBEMIS modeling but 259 daily truck trips are shown in Table 4.11.L. For the Airport DC; 999 daily truck trips are estimated in the URBEMIS modeling, but 1,135 daily truck trips are listed in Table 4.11.L. 918 daily truck trips are modeled for the First Park South 215 DC, but 1,042 trucks are shown in Table 4.11.L. The total number of daily truck trips included in the URBEMIS modeling is 294 daily truck trips less than the number of truck trips estimated in Table 4.11.L in the Traffic and Circulation Section of the Draft EIR. There is a similar discrepancy involving total trips shown in Table 5-2 (Project Trip Generation) and the URBEMIS modeling output sheets. In the Final EIR, the SCAQMD staff recommends that the daily number of truck trips be consistent between the traffic analysis and URBEMIS model runs.

Construction Mitigation Measures

4. Because the lead agency has determined in Section 4.3 - Air Quality, on page 4.3-59 that mitigated construction air quality impacts will exceed the daily SCAQMD regional significance thresholds for VOC, NOx, CO, PM10 and PM2.5 and localized

significance thresholds for construction for NO_2, PM10 and PM2.5, the SCAQMD recommends that the lead agency consider the following changes and adding the following mitigation measures to further reduce construction air quality VOC, NOx, PM10 and PM2.5 impacts from the project, if applicable and feasible:

VOC Recommended Change:
Mitigation Measure:

4.3.6.1D The construction contractor shall utilize pre-coated, pre-colored, and naturally colored building materials when feasible to minimize the amount of VOC emissions from painting activities. ~~To the extent practical~~ ~~c~~Coatings and solvents with a VOC content lower than required under SCAQMD Rule 1113 or no-VOC paints and architectural coatings shall be employed. A list of low/no-VOC paints is provided at the SCAQMD website (www.aqmd.gov/prdas/brochures/paintguide.html). All paints shall be applied using either high-volume low-pressure (HVLP) spray equipment, ~~or~~ by hand application~~.~~, or other application techniques with equivalent or higher transfer efficiency. Specific requirements shall appear in the project construction plans and construction documents.

NO_x Recommended Changes:
Mitigation Measures:

4.3.6.1A Prior to issuance of grading permits, the project applicant shall require by contract specifications that construction operations rely on electricity from infrastructure (e.g., power poles) surrounding the construction site ~~when feasible~~ instead of using portable diesel- or gasoline powered generators. Contract specifications shall be included in the proposed project construction documents, which shall be reviewed by the City.

4.3.6.1B Prior to issuance of grading permits, the project applicant shall require by contract specifications that construction activities are timed so as not to interfere with peak hour traffic and minimize obstruction of through traffic lanes adjacent to the site. Dedicated turn lanes for the movement of construction trucks and equipment shall be provided ~~as needed~~ for each phase of development. Construction trucks shall be routed away from congested street and sensitive receptor areas ~~to the extent feasible~~. ~~If necessary, a~~A flag person shall be retained by the construction supervisor to maintain safety adjacent to exiting roadways. Contract specifications shall be included in the proposed project construction documents, which shall be reviewed by the City.

Recommended Additions:

- Prohibit truck idling in excess of five minutes, both on- and off-site;
- Configure construction parking to minimize traffic interference.
- Improve traffic flow by signal synchronization; and
- All vehicles and equipment will be properly tuned and maintained according to manufacturers' specifications.

PM10 and PM2.5 Recommended Additions:

- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation. Signage with this contact information should be made available for each phase site; and
- Apply water three times daily, or non-toxic soil stabilizers according to manufacturers' specifications, to all unpaved parking or staging areas or unpaved road surfaces.

- Should the proposed project fall under the requirements of Rule 403 – Fugitive Dust for large operations according to SCAQMD Rule 403(c)(18), then the lead agency should submit to the SCAQMD Form 403N (Large Operation Notification Form) and contact SCAQMD engineering and compliance staff at (909) 396-2995.

Operational and Health Risk Effect Mitigation Measures

5. On page 4.3-64 in Section 4.3 Air Quality, the lead agency has estimated that project-specific operational air quality impacts will exceed the established SCAQMD regional daily significance thresholds for VOC, NOx, CO, PM10 and PM2.5 and has estimated adverse impacts from project diesel particulate matter (DPM) from the trucks and train engines operating from the proposed project sites. Therefore, the SCAQMD staff recommends that the lead agency consider the following changes to the proposed mitigation measures to further reduce operational air quality and health impacts for the developer/successor-in-interest for all building occupants and businesses and for all three phase project sites and any future expansion(s), in general, and for each specific site.

Recommended Changes:

Mitigation Measures:

4.3.6.3.A In order to reduce the project's operational diesel particulate matter emissions, prior to issuance of building permits, the project applicant shall require by contract specifications that signs be posted on the site in loading bay areas informing truck drivers of the California Air Resources Board regulations that limit truck idling to no more than five (5) minutes, both on- and off-site. Contract specifications shall be included in the proposed project construction documents, which shall apply to the developer/successor-in-interest and shall be reviewed by the City.

The analysis assumes a complete reduction in diesel particulate matter from on-site forklifts. The SCAQMD staff supports this approach, but recommends that the lead agency alleviates the ambiguity of the forklift mitigation measure (4.3.6.3.C) by specifying that all forklifts be electric powered. It is recommended that the measure be amended by the following:

4.3.6.3.C In order to reduce the project's operational diesel particulate matter emissions, prior to issuance of building permits, the project applicant shall require by contract specifications that all on-site forklifts and other equipment will not be diesel-powered, but required to be electric. Contract specifications shall be included in the proposed project construction documents, which shall apply to the developer/successor-in-interest and shall be reviewed by the City.

4.3.6.3.F As part of the building plan approval, the project proponent shall include transportation and motor vehicle reduction measures. Transportation and motor vehicle reduction measures shall apply to the developer/successor-in-interest ~~may~~ and shall include (but are not limited to):

- Limit idling time to commercial vehicles, including delivery and construction vehicles to five minutes or less, both on- and off-site;
- Require implementation ~~Promote~~ of ride sharing programs (e.g., by designating a certain percentage of parking spaces for ride sharing vehicles, designating adequate passenger loading and unloading and waiting areas for ride sharing vehicles, and providing a web site or message board for coordinating rides) for all initial and future all occupants.
- For large employers (employers who employ 250 or more employees provide facilities that encourage bicycle commuting, including (e.g., locked bicycle storage or covered or indoor bicycle parking).

Additional Design and Operational/Health Effects Measures

6. Because of the current design of the proposed warehouse facilities and significant project air quality impacts estimated in the Draft EIR from the operation of diesel fueled trucks, equipment and train engines, the SCAQMD recommends the following additional mitigation measures to further reduce the potential adverse operational air quality impacts and health risk effects from these mobile diesel sources.

   Recommended Additions:

   - Restrict operations to "clean trucks," such as a 2007 or newer model year;
   - Project-generated trucks servicing the proposed project shall be restricted from residential areas and schools and, a specific truck route shall be delineated on the circulation/transportation plan, implemented with the use of signage, to direct project-related trucks away from sensitive receptors, i.e., ensure that trucks will not enter residential areas or pass by other sensitive receptor areas;
   - Design the warehouse/distribution center and any future expansion such that there are no trucks queuing outside the facility;
   - Post signs outside of each facility providing a phone number where neighbors can call if there is a specific issue;
   - Improve traffic flow by signal synchronization; and
   - Use water sweepers that comply with SCAQMD Rules 1186 and 1186.1.

Rail Mitigation Measure

7. The SCAQMD recommends the lead agency consider the following mitigation measures to reduce emissions of diesel particulate matter (DPM) from locomotive idling.

   - Only use locomotives equipped with anti-idling devices. The SCAQMD staff recommends the lead agency also impose idling restrictions while locomotives are idling on the Phase 2 site side rail. Specifically, SCAQMD staff recommends that locomotives not equipped with anti-idling devices be manually limited to not more than 15 consecutive minutes of idling.
   - SCAQMD staff also recommends that the lead agency ensure to a reasonable certainty that CARB diesel is used in all locomotives.
   - SCAQMD staff also recommends that the lead agency require a complaint line be established, and require prominent signage to be installed on the Phase 2 site property, with an 800 phone number for complaints regarding smoke, noise and idling in excess of 15 minutes for locomotives idling on the Phase 2 site side rail.

Future Projects and Surrounding Land Uses

8. Recommendations from the Western Riverside Council of Government's (WRCOG) "Good Neighbor Guidelines for Siting New and/or Modified Warehouse/Distribution Facilities" are described below. The Guidelines were developed through the WRCOG's Regional Air Quality Task Force. The objective of the Guidelines is to provide local governments and developers with a menu of options or strategies that can reduce exposure to diesel particulate from new and/or modified warehouse or distribution centers. The Guidelines include 7 goals, and a variety of strategies for each goal that can be implemented in whole or part. There are a variety of benefits associated with adopting the guidelines, such as reducing the exposure of residents and sensitive receptors to diesel emissions. The Guidelines can be downloaded at the following URL: http://www.aqmd.gov/ceqa/hdbk.html .

9. Because the lead agency has determined that operational and localized air quality impacts are significant from the proposed truck and rail activities for the proposed project warehouse/distribution sites, the SCAQMD is concerned about the siting of future land uses that might include residences and sensitive receptors surrounding the three proposed sites and truck routes to these sites. Of particular concern, are the areas south of the Phase 3 site, east of the Phase 2 site bordered to the west by Watson Road/South "A" Street, north of Ethanac Road, and south of Ellis Avenue. The zoning for these areas include residential land uses. As noted on page 38 of the WRCOG Good Neighbor Guidelines, "new sensitive receptors, such as housing or schools" that are located next to large industrial/warehouse/distribution types of facilities or next to freeways "worsen air pollution exposure and adversely affect public health by mixing incompatible land uses." Therefore, the SCAQMD recommends that the lead agency follow the WRCOG Good Neighbor Guidelines by maintaining an appropriate buffer between mixed-use industrial and residential uses that the lead agency also consider the land use recommendations in the Guidelines in its future land use decisions for the aforementioned areas to reduce the chance of unnecessary exposure and adverse public health by mixing incompatible land uses. Specific recommendations from the Guidelines that are relevant to the proposed project include:

    - Taking into account the configuration of the proposed distribution centers and avoid locating residences and other sensitive land uses near entry and exit points; and
    - Avoid siting new sensitive land uses within 1,000 feet of a distribution center (that accommodates more than 100 trucks per day, more than 40 trucks with operating TRUs [Transport Refrigeration Units] per day, or where TRU unit operations exceed 300 hours per week).;

SCAQMD staff recommends that the lead agency specify as a condition for project approval to the Tentative Parcel Map and Plot Plan, to preclude the establishment of residential and sensitive receptors to at least 1,000 feet from the property line. An example of lead agencies ensuring that sufficient distance is provided between warehouse

and future sensitive land uses can be found in the Final EIR for the Proposed Highland Fairview Corporate Park (December, 2008) where the City of Moreno Valley acting as the lead agency proposed Mitigation Measure MM AQ-13. Mitigation Measure MM AQ-13 required a deed restricted area to the south of the project property line, precluding the establishment of sensitive receptors such as residences, hospitals, convalescent homes, day-care centers, and schools.

If the revised air quality impacts and health risk assessment analyses results in substantially greater significant operational air quality and cancer risk impacts or non-cancer health risks are concluded to be significant, then the lead agency should consider additional mitigation to reduce air quality impacts from the operational phase of the project.