



South Coast  
Air Quality Management District

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September 25, 2009

Mr. Dan Fairbanks, Planning Director  
Planning Department  
March Joint Powers Authority  
23555 Meyer Driver  
Riverside, CA 92532

**Draft Subsequent Environmental Impact Report (Draft SEIR) for the Proposed  
Expansion of the Fresh and Easy Food Processing and Warehouse 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 Environmental Impact Report.

Pursuant to Public Resources Code Section 21092.5, please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final Environmental Impact Report. The SCAQMD staff would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

Susan Nakamura  
Planning Manager  
Planning, Rules & Area Sources

Attachment

SN:EE:JK:GM

RVC090811-03  
Control Number

### **Emergency Backup Generators**

On page 2-24 in the Project Description, the lead agency describes additional infrastructure components including 13 backup diesel generators that will be used as part of the proposed project. The lead agency is reminded that, if any the proposed generators is greater than 50 brake horsepower (see SCAQMD Rule 219(b)(1) – Equipment Not Requiring a Written Permit Pursuant to Regulation II), then the generators would be subject to SCAQMD Rule 201 – Permit to Construct and that compliance should be referenced in the Final EIR.

### **Operational Emissions**

1. In Appendix D, Air Quality Worksheets, Section 3, Mobile Source Calculations, the lead agency uses EMFAC2007 emission factors for heavy-duty diesel trucks (HDD) to estimate project supplier and store delivery truck trip on-road mobile operational emissions. Although the lead agency's determination that operational air quality impacts would remain significant, it is not clear from the estimates whether the fleet of supplier and store delivery trucks includes trucks weighing more than 33,000 pounds, which would mean that heavy-heavy-duty diesel truck (HHDT) EMFAC2007 emission factors should be used to estimate operational air quality impacts from the heavier diesel fueled trucks. The SCAQMD therefore recommends that the lead agency compare the weight categories of the supplier and delivery store truck fleet with the applicable weight category EMFAC2007 emission factors and re-evaluate operational impacts as needed in the Final EIR in order to more accurately reflect project operational air quality impacts from the heavier diesel trucks. Otherwise, emissions from these heavier diesel trucks would be substantially underestimated.
2. For the Supplier Truck Trips Vehicle Miles Traveled (VMT) estimates shown in Table 3.3-17 on page 3.3-41 for supplier trucks traveling within the South Coast Air Basin (SCAB), the unadjusted VMT mileage totals (unadjusted for back hauling to third parties and supplier trips making empty backhauls to the supplier) is not consistent with the Supplier Trucks Air Quality Worksheet in Appendix D. Comparing the VMT totals for supply trucks operating within the SCAB, Table 3.3-17 shows an unadjusted total of 98,715 round trip miles. The Supplier Truck Trips worksheet in Appendix D has an unadjusted total of 91,499 round-trip VMT within the SCAB, a difference of 7,216 miles. In the Final EIR, the lead agency should explain this apparent discrepancy and revise the Final EIR air quality analysis as needed.

### **Construction Mitigation Measures**

3. Because the lead agency has determined in Section 3.3 Air Quality on page 3.3-43 that mitigated construction air quality impacts will exceed the daily SCAQMD regional significance thresholds for VOC and NOx and localized significance thresholds for NOx, PM10 and PM2.5, the SCAQMD recommends that the lead agency consider adding the following mitigation measures to further reduce

construction air quality VOC, NO<sub>x</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> impacts from the project, if applicable and feasible:

VOC

Recommended Additions:

- Use required coatings and solvents with a VOC content lower than required under Rule 1113;
- Contractors shall use varying-pressure-low-volume (HPLV) paint applicators or other application techniques with equivalent or higher transfer efficiency; and
- Construct/build with materials that do not require painting.

NO<sub>x</sub>

Recommended Additions:

- Prohibit truck idling in excess of five minutes;
- 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);
- If Tier 2 or Tier 3 off-road construction equipment is not available, require alternative fueled off-road equipment;
- Use electricity from power poles rather than temporary diesel or gasoline power generators;
- 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 or sensitive receptor areas;
- 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:

- Install wheel washers where vehicles enter and exit the construction site onto paved roads or wash off trucks and any equipment leaving the site each trip;
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation;
- Apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more);
- Replace ground cover in disturbed areas as quickly as possible;
- Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 mph;
- Water active sites at least twice daily;
- All trucks hauling dirt, sand, soil, or other loose materials are to be covered;
- 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;
- Pave road and road shoulders;
- Traffic speeds on all unpaved roads to be reduced to 15 mph or less; and
- Sweep streets at the end of the day if visible soil is carried onto adjacent public paved roads (recommend water sweepers with reclaimed water).

**Operational Mitigation Measures**

4. On page 3.3-41 in Section 3.3 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, NO<sub>x</sub>, CO, PM10 and PM2.5. Therefore, the SCAQMD recommends that the lead agency consider the following additional mitigation measures to further reduce cumulative operational air quality impacts from the project in conjunction with other similar projects at the business park:

Recommended Additions:

- Prohibit all vehicles from idling in excess of five minutes, both on- and off-site.
- Design the warehouse/distribution center expansion such that entrances and exits are such that trucks are not traversing past neighbors or other sensitive receptors;
- Design the warehouse/distribution center expansion 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;
- 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;
- Post signs outside of the facility providing a phone number where neighbors can call if there is a specific issue;
- 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 water sweepers that comply with SCAQMD Rules 1186 and 1186.1;
- Require or provide incentives to use low sulfur diesel fuel with particulate traps; and
- Alternative fueled off-road equipment.

#### **Air Dispersion Modeling for LST and HRA**

5. The lead agency used air dispersion modeling to estimate concentrations for both the localized significant threshold (LST) analysis and health risk assessment (HRA). The air dispersion modeling was prepared using AERMOD. AERMOD within the jurisdiction of SCAQMD should be completed according to guidance provided on [http://www.aqmd.gov/smog/metdata/AERMOD\\_ModelingGuidance.html](http://www.aqmd.gov/smog/metdata/AERMOD_ModelingGuidance.html). The following comments apply to air dispersion modeling for both analyses.
6. Since no description of the meteorological data could be found in the Draft SEIR, the SCAQMD staff could not verify whether the meteorological data used for air dispersion modeling was approved by the ARB or EPA. The normal protocol for air dispersion modeling is for meteorological data sets to be approved by ARB or EPA prior to use in air dispersion modeling. In lieu of obtaining prior approval from ARB or EPA, the lead agency may use meteorological data developed by the SCAQMD and made available on SCAQMD's website at <http://www.aqmd.gov/smog/metdata/AERMOD.html>. The SCAQMD staff recommends that the lead agency either provide documentation in the Final SEIR of meteorological data approval from ARB or EPA, or use the available SCAQMD data.

7. AERMOD was run using the rural air dispersion coefficient. All air dispersion modeling in the District is required to use the urban air dispersion coefficient. Since rural was used, the Final EIR should include a discussion to support this change based on the U.S. EPA procedure outlined in [Section 7.2.3 of 40 CFR Part 51 Appendix W](#) (November 2005) or concentrations should be modeled with the urban air dispersion coefficient.
8. Air dispersion modeling does not include building downwash, which may affect point sources. The Final Subsequent EIR should document that building downwash is not required because of good engineering principles or building downwash should be added to the air dispersion modeling presented in the Final Subsequent EIR.
9. The release height of the idle volume source is presented in the air dispersion files as three meters in height. The AERMOD user's guide defines release height as the center of the volume; therefore, vertical dimension or building height should be six meters. The initial vertical dimension is set at 0.930 meters. This is inconsistent with the AERMOD user's guide. If the source is considered to be surface-based or elevated on or adjacent to a building, then the initial vertical dimension would be two meters (6/2.15). If the source is considered elevated not on or adjacent to a building, then the initial vertical dimension would be four meters (6/4.3). Initial vertical dimensions should follow standard EPA protocol in the Final Subsequent EIR.
10. Qualitative description of sensitive receptor locations were provided in the Draft Subsequent EIR. The UTM coordinates of the receptors should be provided somewhere in the Final Subsequent EIR so that the concentrations reported at the receptors can be verified by the air dispersion model output files.