



South Coast Air Quality Management District

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SENT VIA USPS AND E-MAIL:

August 3, 2017

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Draft Environmental Impact Report (Draft EIR) for the Proposed Meridian West Campus – Lower Plateau Project (“Proposed Project”)

The South Coast Air Quality Management District (SCAQMD) staff 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.

SCAQMD’s 2016 Air Quality Management Plan

On March 3, 2017, the SCAQMD’s Governing Board adopted the 2016 Air Quality Management Plan (2016 AQMP), which was later approved by the California Air Resources Board of Directors on March 23rd. The 2016 AQMP¹ is a regional blueprint for achieving air quality standards and healthful air in the South Coast Air Basin (Basin). Built upon the progress in implementing the 2007 and 2012 AQMPs, the 2016 AQMP provides a regional perspective on air quality and lays out the challenges facing the Basin. The most significant air quality challenge in the Basin is to reduce an additional 45 percent reduction in NOx emissions in 2023 and an additional 55 percent reduction in NOx emissions beyond 2031 levels for ozone attainment.

Project Description

The Lead Agency proposes to construct and operate 1,845,000 square feet (sf) of high-cube warehouses, 362,000 sf of general light industry, and 66,000 sf of business parks on approximately 135 acres (“Proposed Project”). The Proposed Project is surrounded by commercial and vacant land to the north, commercial and industrial uses to the east, vacant land to the south, and residential land uses to the west. Construction is expected to occur in two phases over two years starting in 2018².

Air Quality and Health Risk Assessment (HRA) Analyses

In the Air Quality Section, the Lead Agency quantified the Proposed Project’s construction and operation emissions and compared them to SCAQMD’s regional and localized air quality CEQA significance thresholds. The air quality analysis was based on approximately 7,731 total vehicle trips, including 1,778 daily diesel truck trips³. The Lead Agency found that regional operational NOx emissions are significant and unavoidable after incorporating mitigation measures (MM) AQ-1 through MM AQ-8. Additionally, the Lead Agency performed a HRA and found that the Maximum Exposed Individual Resident cancer risk would be 4.2 in one million which is below SCAQMD’s CEQA significance threshold of 10 in one million for cancer risk⁴.

¹ South Coast Air Quality Management District. March 3, 2017. *2016 Air Quality Management Plan*. Available at: <http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan>.

² Appendix B1. Table 4. Construction Schedule Assumption.

³ Draft EIR. Section 4.10, *Noise*. Page 4.10-45.

⁴ Draft EIR. Section 4.2, *Air Quality*. Page 4.2-39.

Achieving NOx emission reductions in a timely manner is critical to attaining the National Ambient Air Quality Standard (NAAQS) for ozone before the 2023 and 2031 deadlines. SCAQMD is committed to attain the ozone NAAQS as expeditiously as practicable. Therefore, SCAQMD staff recommends an additional mitigation measure to further reduce the significant operational NOx emissions. Please see the attachment for more information.

Pursuant to the California Public Resources Code Section 21092.5 and the CEQA Guidelines Section 15088, SCAQMD staff requests that the Lead Agency provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final EIR.

SCAQMD staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Jack Cheng, Air Quality Specialist, CEQA IGR Section, at (909) 396-2448, if you have any questions regarding the enclosed comments.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment

LS:JC

RVC170620-10

Control Number

ATTACHMENT

Additional Mitigation Measure for Operational Air Quality Impacts (Mobile Sources)

1. CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant impacts. To further reduce the significant operational NO_x emissions from the Proposed Project, SCAQMD staff recommends incorporating the following on-road mobile-source truck related mitigation measure in the Final EIR. For more information on potential mitigation measures as guidance to the Lead Agency, please visit SCAQMD's CEQA Air Quality Handbook website⁵.
 - a. **MM AQ-9: Require the use of 2010 and newer haul trucks (e.g., material delivery trucks and soil import/export). In the event that that 2010 model year or newer diesel haul trucks cannot be obtained, provide documentation as information becomes available and use trucks that meet EPA 2007 model year NO_x emissions requirements¹, at a minimum. Additionally, consider other measures such as incentives, phase-in schedules for clean trucks, etc.**

Compliance with SCAQMD Rule 403(e) – Large Operations

2. The Proposed Project is a large operation on 135 acres (50 acres or more of disturbed surface area; or daily earth-moving operations of 3,850 cubic yards or more on three days in any year) in the South Coast Air Basin. The Lead Agency is required to comply with SCAQMD Rule 403(e) – Additional Requirements for Large Operations⁶. The requirements may include, but are not limited to, Large Operation Notification (Form 403 N), appropriate signage, additional dust control measures, and employment of a dust control supervisor that has successfully completed the Dust Control in the South Coast Air Basin training class. Therefore, the Final EIR should contain a detailed description of how the Proposed Project will comply with [Rule 403\(e\)](#). Please contact dustcontrol@aqmd.gov or (909) 396-2608 for more information.

Additional requirements may include, but are not limited to, the following:

- Implementation of Table 2 of Rule 403 at all times and implementation of the actions specified in Table 3 of Rule 403 when applicable.
- Submittal of a fully executed Large Operation Notification to the Executive Officer.
- Maintenance of daily records to document the specific dust control actions taken.
- Installation and maintenance of project signage with project contact person that meets the minimum standards of Rule 403 Implementation Handbook.
- Identification of a dust control supervisor that has completed the SCAQMD Fugitive Dust Control Class.

⁵ South Coast Air Quality Management District. <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook>.

⁶ *Ibid.* Rule 403. Last amended June 3, 2005. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf?sfvrsn=4>.

Siting Warehouses Near Residences

3. Based on a review of the project description and aerial photographs, SCAQMD staff found that the nearest sensitive receptor is approximately 500 feet southwest of the Proposed Project. While SCAQMD staff recognizes that there are many factors Lead Agencies must consider when making local planning and land use decisions, there are concerns about the proximity of a warehouse to the existing residences and the potential long-term air quality impacts to the people living near the warehouse and along the truck routes as a result of increased truck activities. SCAQMD staff recommends that the Lead Agency use the California Air Resources Board's (CARB) Air Quality and Land Use Handbook as a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land-use decision making process. In the CARB's Air Quality and Land Use Handbook, CARB recommends a buffer of at least 1,000 feet between distribution centers that accommodate more than 100 trucks per day and a buffer of 500 feet from high-traffic urban roadways⁷.

⁷ California Air Resources Board. 2005. Air Quality and Land Use Handbook. Accessed at: <http://www.arb.ca.gov/ch/handbook.pdf>. Guidance is for siting new sensitive land uses within 1,000 feet of a distribution center (Page 4). The buffer is a neutral mitigation measure provided to minimize truck activity emission impacts to sensitive receptors. Besides truck activity of more than 100 trucks per day, this guidance applies to distribution centers that accommodate more than 40 transport refrigeration units per day or where TRU operations will exceed 300 hours per week truck activities and sensitive receptors (Page 4).