



South Coast
Air Quality Management District

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February 22, 2008

Mr. Christian Hinojosa, Project Planner
County of Riverside Planning Department
4080 Lemon Street, 9th Floor
Riverside, Ca 92502-1409

**Draft Environmental Impact Report (Draft EIR) No. 00485 for the Proposed Oleander
Business Park – Tentative Parcel Map No. 33942; Plot Plan No. 20699**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The SCAQMD also appreciates the additional time to review the Draft EIR for the proposed project and provide comments. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final Environmental Impact Report prior to approval of 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 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,

Steve Smith, Ph. D.
Program Supervisor, CEQA Section
Planning, Rule Development & Area Sources

Attachment

SS:GM

RVC080108-07
Control Number

Construction, Operational Emissions and Health Risk Assessment Impacts

1. In the Draft EIR, the lead agency estimated air quality construction, operation and cancer risk impacts using the California Air Resources Board (CARB) EMFAC2002 model for on-road mobile sources and the OFFROAD2002 model for off-road mobile sources. In November 2006, CARB released updated versions of both models, EMFAC2007 and OFFROAD2007. For some pollutants, the updated models have revised the emission factors upwards, which means that the air quality analysis underestimates emissions for some pollutants. Given that the lead agency has concluded that construction, operation, and cancer risk impacts are significant, reanalyzing air quality impacts using the updated models will most likely not change the conclusions. Therefore, it is up to the lead agency to decide whether or not to revise the analyses. However, for future projects, the updated models should be used. The latest version of EMFAC2007 can be found at the following website: <http://www.arb.ca.gov/msei/msei.htm> . The latest version of OFFROAD2007 can be found at the following website: <http://www.arb.ca.gov/msei/offroad/offroad/offroad.htm> .

Operational Mitigation Measures

2. The lead agency has concluded that the cancer risk to nearby sensitive receptors southwest of the Building C from on-road diesel-particulate truck emissions will exceed the SCAQMD's threshold of significance for cancer risk. The SCAQMD recommends that Mitigation Measure 4.4-21 on page 4-70 of the Environmental Analysis portion of the Draft EIR be revised to reduce exposure to sensitive receptors from the trucks that are otherwise operating at the proposed site and in conjunction with other similar projects at the business park:

Recommended Change:

- 4.4-21 All ~~loading~~ docks, including those that accommodate transport refrigeration unit (TRUs), shall not be permitted in the southwestern corner of Building C or within 300 meters of any off-site sensitive receptor (residential home, school, day-care center, outdoor park or public playground, hospital or health facility). Prior to approval of Plot Plans, Site Plans and/or building permits, the County of Riverside Planning Department shall review the configuration of Building C and the location of all loading docks to ensure that all loading bays, including those that accommodate transport refrigeration units (TRUs), are sited at least 300 meters from the nearest off-site sensitive receptor.