



South Coast
Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

E-MAILED: May 0, 2009

May 01, 2009

Ms. Diane Sbardellati, Associate Planner
City of Perris
Planning Division
135 N "D" Street
Perris, CA 92570-2200

**Review of the Draft Environmental Impact Report (Draft EIR) for
Ridge Commerce Center II**

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 SCAQMD staff 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,

Steve Smith

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

Attachment

SN:DG

RVC090312-03
Control Number

Air Quality Mitigation Measures:

Construction

1. The lead agency provided the projected regional construction air quality impact results for the proposed project on page 4.3-30 and 4.3-32 of the Draft EIR. The results demonstrate that the project would generate VOC and NO_x emissions that exceed the SCAQMD's recommended regional construction emissions significance thresholds. The lead agency proposes a list of measures to mitigate some of these emissions; however, to further reduce the project's regional air quality impacts SCAQMD staff recommends that the lead agency consider adding the following mitigation measures, if feasible:

NO_x

Recommended Additions:

- Alternative fueled off-road equipment; and
- Use \Rule 1186.1 certified street sweepers when sweeping roadways adjacent to the proposed project (recommend water sweepers with reclaimed water).

In addition to the above NO_x measures, SCAQMD staff recommends modifying the following existing mitigation measure as follows.

- 4.3.1 All diesel-powered construction equipment ~~in excess of 50 horsepower shall be equipped with~~ meet or exceed Tier III standards. Alternatively, all construction equipment shall be equipped with CARB- verified oxidation catalysts, diesel particulate filter emission controls, using equipment with the greatest control efficiency for the specific category of equipment, resulting in a minimum of 50 percent particulate matter control ~~Further, the project proponent shall demonstrate that these verified/certified technologies are available to be used at the time of project construction.~~ Correlating notations shall appear on the project construction plans and construction documents. A listing of available off-road diesel emission control equipment meeting this requirement is provided at the following AQMD website:
http://www.aqmd.gov/ceqa/handbook/mitigation/offroad/MM_offroad.html.
- 4.3.4 Prior to issuance of the first grading permit, the project proponent shall prepare a traffic control plan for review and approval by the City. The traffic control plan shall identify safe detours around the project construction site, and provide for all necessary temporary traffic controls (e.g., flag persons, and lane cones). Specifically, the traffic control plan shall, at a minimum, require the project proponent to:
 - 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 hours,
- Reroute construction trucks away from congested streets or sensitive receptor areas, and
- Improve traffic flow by signal synchronization.

The traffic control plan shall be prepared in accordance with U.S. Department of Transportation Federal Highways Administration Rule on Work Zone Safety 23 CFR 630 Subpart 1, Developing and Implementing Traffic Management Plans for Work Zones.

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

www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html.

VOC

Recommended Additions:

- Construct/build with materials that do not require painting; and
- Use pre-painted construction materials.

In addition to the above VOC measures, SCAQMD staff recommends modifying the following existing mitigation measure as follows.

- 4.3.5 To the extent practicable use required coatings and solvents with a VOC content lower than required under Rule 1113 or no-VOC paints and architectural coatings shall be employed. A list of low/no-VOC paints is provided at the following AQMD 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. Correlating notations shall appear on the project construction plans and construction documents.

Operation

2. According to Figure 4.1-2 of the Draft EIR light industrial, commercial neighborhood and business park land uses surround the proposed project and residential land uses are in close proximity to the project site. Since the proposed project will attract a high volume of heavy-duty diesel trucks, SCAQMD staff requests that the lead agency include a mitigation measure that would specify the conditions for approval of the Change of Zone, Tentative Parcel Map and Plot Plan to preclude the

establishment of new residential and sensitive receptors of at least 1,000 feet from the project boundaries.

Also, it is recommended that the lead agency consider the following mitigation measures to further reduce localized, regional, and cumulative operational air quality impacts from the proposed project:

- 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 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, and
- Conduct air quality monitoring at sensitive receptors.