



## South Coast Air Quality Management District

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### **Review of the Draft Environmental Impact Report (Draft EIR) for the Rados Distribution Center Project**

The South Coast Air Quality Management District (AQMD) staff appreciates the opportunity to comment on the above-mentioned document, including with an extended review period. The following comments are meant as guidance for the lead agency and should be incorporated into the Final Environmental Impact Report (Final EIR) as appropriate.

#### **Truck Trip Rates**

AQMD staff is concerned that the air quality impacts reported in the Draft EIR may be underestimated. Specifically, the lead agency states in Table 4.12-G that there will be no more than 384 heavy duty truck trips per day at this facility. This equates to 192 trucks visiting the facility per day. This low number of truck trips is surprising given the large number of proposed loading docks (254 docks) and truck parking stalls (353) [App. C, page 1]. Based on these figures, over two-thirds of the loading docks and truck parking stalls will remain idle from heavy duty truck activity on a daily basis [ $192 / (254+353) = 0.32$ ]. Based on information presented in the Draft EIR, this presumed level of inactivity does not seem reasonable for a project designed to serve as a major distribution center serving regional interests.

The lead agency uses this low truck trip rate in the Draft EIR to determine that operational air quality impacts will not expose sensitive receptors to significant pollutant concentrations, including a nearby school. AQMD staff therefore recommends that further justification be presented in the Final EIR for the minimal truck use projected at this distribution center. If the lead agency determines that additional trucks may use this facility, impacts from this increased use should be presented in either a Recirculated Draft EIR or the Final EIR. If the lead agency determines that the truck trip rate specified in the Draft EIR is appropriate, enforceable conditions should be placed in the Final EIR that limit the number of heavy duty trucks visiting the facility to 192 per day or less.

### **Modeling Analysis**

AQMD staff is also concerned that the modeling analysis does not accurately portray project emissions. Revisions to the modeling should be included in the Recirculated Draft EIR or Final EIR based on the following:

- The LST air quality analysis presented in the Draft EIR does not account for truck travel between the proposed facility and the closest major traffic corridors. Truck travel routes may run adjacent to nearby sensitive receptors such as schools or residences. AQMD staff recommends that the lead agency clearly specify truck routes between this facility and nearby transportation corridors, and the air quality impacts from trucks traveling along these arterial roads in the Recirculated Draft EIR or Final EIR.
- Air quality modeling of facility operations in the Draft EIR uses emission rates derived from URBEMIS outputs for operational truck activity offsite as input for AERMOD emission rates for truck activity onsite. This emission rate is inappropriate for AERMOD use as it is based on trucks traveling on roadways, and does not account for truck travel or idling activities onsite. Site specific emission factors should be calculated based on assumed onsite travel distances and up to 15 minutes of idling activity per truck visit. This emission rate should then be used in the AERMOD modeling analysis.
- For NO<sub>x</sub> emissions, the release height of source SLINE1 varies from 14.01 feet to 7.45 feet. AQMD staff recommends that an explanation of this reduction in release height should be presented in the Final EIR, or the release height should remain constant in the final modeling analysis.
- In the Health Risk Assessment (HRA) Diesel Particulate Matter (DPM) modeling file, 10 of the 19 roadway line sources modeled have emission rates of zero grams per second (SLINE 1, 2, 3, 4, 5, 6, 8, 9, 10, 15). AQMD staff recommends that the lead agency revise the analysis to include these roadway segments in the HRA, especially those near sensitive receptors.

### **Mitigation Measures**

Lastly, given the project's potential exposure of sensitive receptors surrounding the project site to diesel emissions, AQMD staff recommends that the lead agency consult the Western Riverside Council of Governments *Good Neighbor Guidelines for Siting New and/or Modified Warehouse/Distribution Facilities*.<sup>1</sup> Consistent with this guidance, AQMD staff recommends adding the following mitigation measures to minimize potentially significant air quality impacts from the operational phase of the project, if feasible:

- ❖ Restrict operation to “clean” trucks, such as a 2007 or newer model year or 2010 compliant vehicle;

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<sup>1</sup> Available here: <http://www.wrcog.cog.ca.us/downloads/Good+Neighbor+Policies+Final-091205.pdf>

- ❖ Avoid siting new sensitive land uses within 1,000 feet of the warehouse/distribution center;
- ❖ Design the warehouse/distribution center such that entrances and exits discourage trucks from traversing past neighbors or other sensitive receptors;
- ❖ Develop, adopt and enforce truck routes both in an 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;
- ❖ Re-route truck traffic by adding direct off-ramps for the truck or by restricting truck traffic on certain sensitive routes;
- ❖ Require or provide incentives for particulate traps that meet CARB certified level 3 requirements;
- ❖ Electrify service equipment at facility;
- ❖ Improve traffic flow by signal synchronization; and
- ❖ Conduct air quality monitoring at sensitive receptors.

AQMD staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Ian MacMillan, Program Supervisor CEQA Section, at (909) 396-3244, if you have any questions regarding the enclosed comments.

Sincerely,



Ian MacMillan

Program Supervisor – CEQA Inter-Governmental Review

Attachment

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