



South Coast Air Quality Management District

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Draft Environmental Impact Report (Draft EIR) for the Proposed March Business Center, PA011-0007 (Tentative Parcel Map No. 35879)

The South Coast Air Quality Management District (AQMD) staff appreciates the opportunity to comment on the above-mentioned document and the lead agency's willingness to provide technical files for our review. As AQMD staff did not receive the final set of technical files until yesterday, we would appreciate the lead agency considering these late comments. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final CEQA document.

In the project description, the lead agency proposes construction of warehouse distribution center and light industrial uses totaling 1,484,407 square feet on a 75.05 acre site that will be sub-divided into four parcels. Warehouse distribution center buildings will be constructed on three of the four parcels totaling 1,467,675 square feet with the remaining parcel occupied by light industrial uses. The proposed project would include 264 loading docks servicing 1,267 trucks operating daily at the site. Construction would be completed in two phases starting in January 2013 with project build-out estimated in Year 2016. During Phase I, the entire 75.05 acre site would be graded with approximately 111,030 cubic yards of cut and 159,957 cubic yards of fill occurring that would be balanced on-site.

The AQMD staff is concerned that the proposed construction and operation of the project will yield emissions that exceed the AQMD recommended significance thresholds. Additional feasible mitigation measures should be considered to minimize these impacts in the Final EIR. In addition, although project cumulative air quality and health effect impacts were discussed in general terms, specific past, current, and foreseeably related projects were not detailed in the Draft EIR. Since there are a number of related projects involving diesel fueled trucks near the project area, these previous and current projects should be included in the cumulative portion of the Final EIR. Lastly, some calculation methodologies in the Health Risk Assessment should be reviewed and modified in the Final EIR. Detailed comments follow in the attachment.

Mr. Mark Gross, AICP
Senior Planner

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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 AQMD staff is available to work with the Lead Agency to address these issues and any other air quality 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,



Ian MacMillan
Program Supervisor, Inter-Governmental Review
Planning, Rule Development & Area Sources

IM:GM

SBC120427-05
Control Number

Operational Mitigation Measures

1. Because the lead agency has determined that air quality impacts from project operations will exceed recommended regional thresholds for VOC and NOx, the AQMD staff recommends that the lead agency consider the following change and additional mitigation measures along with the measures referenced by the lead agency on page 4.2-26 of the Draft EIR. Other lead agencies that have used these measures include the City of Banning¹, Riverside County², City of San Bernardino³, and the San Pedro Bay Ports⁴, among others.

Recommended change:

MM 4.2-6 Prior to issuance of occupancy permits, the applicant shall provide evidence that a sign has been installed at each exit driveway, providing directional information to the City's truck route. Text on the sign shall read "To Truck Route" with a directional arrow. Truck routes shall be clearly marked with trailblazer signs, so trucks will not enter residential areas.

Recommended additions:

- At project start, all heavy duty trucks entering the property must meet or exceed 2010 engine emission standards specified in California Code of Regulations Title 13, Article 4.5, Chapter 1, Section 2025.
- If the above clean truck requirements are infeasible, a phase-in schedule should be put forth that will feasibly achieve emission reductions as soon as possible, and faster than existing regulations. Should an alternative schedule be found necessary, the AQMD staff should be consulted prior to approving the schedule.
- The facility operator will maintain a log of all trucks entering the facility to ensure that on average, the daily truck fleet meets the quantities and emission standards listed in the Draft EIR. This log should be available for inspection by city staff at any time.
- The facility operator will ensure that site staff in charge of keeping the daily log and monitoring for excess idling will be trained/certified in diesel health effects and technologies [for example, by requiring attendance at CARB approved courses (such as the free, one-day Course #512)].
- Limit the daily number of trucks allowed at each facility to levels analyzed in the Final EIR. If higher daily truck volumes are anticipated to visit the site, the lead

¹ Banning Business Park

<http://banning.ca.us/archives/30/July%2013,%202010%20City%20Council%20Agenda.pdf>

² Mira Loma Commerce Center

http://www.rctlma.org/online/content/conditions_of_approval.aspx?PERMITNO=pp17788

³ Palm/Industrial Distribution Center <http://www.ci.san-bernardino.ca.us/civica/filebank/blobdload.asp?BlobID=11793>

⁴ Clean Trucks Program <http://www.cleanairactionplan.org/cleantrucks/>

agency should commit to re-evaluating the project through CEQA prior to allowing this higher activity level.

- Require at least a portion of the fleet to utilize alternative fueled technologies.
- The 2012 Regional Transportation Plan includes a zero/near-zero emissions truck corridor along the SR-60 freeway. Because at least a portion of the trucks serving this project may be expected to travel along this route, the project should provide onsite alternative fueling infrastructure, such as electric charging stations or natural gas fueling that will help facilitate these low-emitting trucks.
- At a minimum, require tenants upon occupancy that do not already operate 2007 and newer trucks to apply in good faith for funding to replace/retrofit their trucks, such as Carl Moyer, VIP, Prop 1B, or other similar funds. Should funds be awarded, the tenant should also be required to accept and use them.
- All onsite cargo handling equipment (e.g., hostlers, forklifts, etc.) should be powered by zero/near-zero emission technologies, such as electricity.
- 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.
- 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.
- Improve traffic flow by signal synchronization.
- Use water sweepers that comply with SCAQMD Rules 1186 and 1186.1.

Health Risk Assessment Modeling

2. AQMD staff noted several items that should be corrected in the Health Risk Assessment modeling prior to certifying the EIR. These include:
 - The Traffic chapter of the Draft EIR presents an estimate of the expected trip rate for the project. For the high cube warehouses, an overall trip rate of 1.44 trips/thousand square feet (tsf) was used based on average rates from the ITE 8th Edition manual. The high-cube warehouse truck trip fraction in the Draft EIR is 54% of all of these trips based on the Fontana Truck Trip study. The final truck trip rate is therefore 0.78 trips/tsf. This is lower than the recommended truck trip rate from CalEEMod guidance of 1.04 trips/tsf based on the 95th percentile of all high-cube warehouses.

Because tenants have not been identified for this project (page 3-20 of the Draft EIR), AQMD staff recommends that the CalEEMod default truck trip rate be used for the air quality analysis. Because AQMD recommended air quality thresholds are designed to determine peak impacts and to be health protective, the more conservative rate should be used to determine potential impacts without more project-specific information. Alternatively, the Draft EIR could contain a condition or mitigation measure that limits the number of trucks that could serve this facility to those identified in the air quality and health risk assessment analysis.

- The residential receptor reported with the highest risk does not represent the receptor with the highest modeled concentration of Diesel Particulate Matter (DPM). Based on the modeling files submitted to AQMD staff, the receptors with the highest risk are located east of the project site along Indian Street. The risks to the receptors with the highest concentration of DPM should be used to make the significance determination in the EIR.
- Because this facility could serve more than 1,200 trucks each day based on the estimates presented in the Draft EIR, AQMD staff recommends that the entire truck route from the facility to the closest freeway entrances be modeled. For example, the currently modeled sources do not extend very far beyond Gentian Avenue along Heacock Street. As aerial photos depict many homes located adjacent to Heacock Street on this route north of Gentian Avenue, the impacts to these receptors should be included in the HRA.
- Based on Table 2-2 of the HRA, approximately 63% of all trucks serving the largest warehouse will use the western side of the building. However Exhibit 4-2 from the Traffic Impact Analysis shows that the number of trucks on the east and west side of the facility are expected to be equal. Because the highest impacts from this project are currently modeled to the east of the project site, this assumption should be revised in the HRA, or a condition should be placed on the project that limits the number of trucks that can use the eastern side of the site.
- The line sources used to represent onsite truck travel and idling typically use half of the entire line source length to determine total Vehicle Miles Travelled (VMT). This method was presumably used because not all trucks are expected to travel the length of the facility to reach the farthest dock door. On average, trucks would only travel half the distance. However, this assumption should only apply to the length of the line source that spans the dock doors on that side of the building. The model uses individual line sources that include travel outside of dock areas. The VMT is therefore incorrectly reduced by 50% along these portions of truck travel. The source emission calculations should be modified and the model re-run to determine the impacts using the correct onsite VMT.
- Idling emissions are spread out throughout the length of line sources. As indicated in the comment above, the line sources include areas outside of dock areas, such as Krameria Street. Unless idling is expected along the entire

length of every line source, the idling emissions should be focused only in sources that are expected to include idling during project operations.

- The project description includes a new road located east of the largest high-cube warehouse called Cosmos Street. The HRA model does not include any trucking along this street and keeps all trucking onsite. Because this street is located closer to the highest impacted residences, truck travel along its length
- Some typographical corrections should be made in the HRA. Footnote A in Table 2-2 states that the VMT column represents idling hours for some sources. After reviewing the electronic versions of the spreadsheet used to create the table, this statement appears incorrect. The correct description should be put into the Final EIR. In addition, Appendix B of the HRA shows emission rates for trucks travelling 0, 10, and 25 mph. The EMFAC run included to support these rates shows that 5 mph was used instead of 10 mph. This discrepancy should be corrected in the Final EIR and the model should include the expected onsite travel speed.
- The model used emission rates from EMFAC 2007, however the state Air Resources Board has recently released an update to EMFAC. EMFAC 2011 takes into account recent rulemaking activity related to diesel trucks and includes lower emission rates. The lead agency should consider using these revised emission estimates in the Final EIR.

Cumulative Impacts

3. The Cumulative Impacts Section should be revised in the Final EIR to include the projects listed below as well as any other foreseeable projects if those projects include vehicle traffic, especially diesel fueled trucks, that would utilize the same truck routes as the proposed project. The cumulative traffic on local roads from these or other planned goods movement facilities in the immediate vicinity may contribute to a localized air quality health risk from diesel particulate matter that should be discussed in the Final EIR.

Name	Size (MSF)	EIR Date
VIP Moreno Valley Project	1.6	March 2012 Draft
Starcrest Distribution Center	0.5	February 2012 Final
Rados Distribution Center	1.2	July 2011 Final
Perris Ridge Commerce Center II	2.0	August 2009 Final
Markham Business Center	1.75	June 2009 Final
Oakmont II	1.6	June 2009 Draft
Rider Distribution Center	0.6	April 2009 Final
Oleander Industrial Park	1.2	September 2008 Final

MSF – Million Square Feet

Construction Mitigation Measures

4. Starting on page 4.2-22 and throughout the Draft EIR (pages 4.2-24 and 4.2-25), the lead agency included project requirements that were assumed to be implemented throughout the analysis of air quality impacts. These project requirements and/or conditions require compliance with various SCAQMD and California state rules and regulations to reduce air quality impacts from construction activities. For example, PR 4.2-2, "The Project is required to comply with the provisions of South Coast Air Quality Management District 403, 'Fugitive Dust.'" Rather than stating compliance in general with these and other rules, regulations, laws, etc., the AQMD staff recommends that specific measures, from Rule 403 for example, be stated as specific mitigation measures. They should also be incorporated into the project description, and (as noted by the lead agency on page 4.2-22) incorporated into project-specific impact calculations where applicable in the Final EIR (see also comment #4).
5. In the Draft EIR, the lead agency has determined that project regional and localized construction impacts exceed the SCAQMD recommended significance thresholds. The AQMD staff therefore recommends the following additional mitigation measures during the projected construction period in addition to the project requirements and mitigation measures proposed starting on page 4.2-23 (see comment #3) to further reduce NOx, PM10 and PM2.5 impacts, if applicable and feasible.

Recommended change:

MM 4.2-1 Prior to grading permit issuance, the City shall verify the following note is included on the grading plan:

~~"During construction activity~~From project start to December 31, 2014, the contractor shall utilize California Air Resources Board (CARB) Tier III certified equipment or better for ~~the following pieces of equipment: Graders, Rubber Tired Dozers, and Scrapers~~all off-road diesel-powered construction equipment greater than 50 hp. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations."

Recommended additions:

- Limit the amounts of daily soil disturbance to the amounts analyzed in the Draft EIR.
- Apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more).
- All trucks hauling dirt, sand, soil, or other loose materials are to be covered.
- Sweep streets at the end of the day if visible soil is carried onto adjacent public paved roads (recommend water sweepers with reclaimed water).

- Prohibit truck idling in excess of five minutes;
- Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow.
- 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; and
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation.
- Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 mph;

Further, other lead agencies in the region including LA County Metro, the Port of Los Angeles, and the Port of Long Beach have also enacted the following mitigation measures. AQMD staff recommends the following measures to further reduce air quality impacts from construction equipment exhaust:

- Post-January 1, 2015: All off-road diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
- A copy of each unit's certified tier specification, BACT documentation, and CARB or AQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.

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 .