



South Coast Air Quality Management District

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November 5, 2012

Mr. Jeff Bradshaw, Associate Planner, JeffreyB@moval.org
Community & Economic Development Department
City of Moreno Valley
14177 Frederick Street
Moreno Valley, CA 92553

Draft Environmental Impact Report (Draft EIR) for the Proposed RPT Centerpointe West Prologis Eucalyptus Industrial Park Project (SCH #2012081034)

The South Coast Air Quality Management District (AQMD) 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 CEQA document.

In the project description, the lead agency proposes adding 507,720 square feet to the existing 779,016 square foot Harbor Freight warehouse distribution facility building and construction of two new warehouse buildings expanding the existing Harbor Freight Facility on adjoining properties. With the proposed expansion and two new buildings, the proposed project would include 1,281,000 square feet of new development on a 56.2 acre site. The proposed project would involve a total of 1,844 daily vehicle trips including 996 trucks per day. Construction would begin in March of 2013 and last two years. Project buildout would occur in 2017.

The AQMD staff is concerned that all feasible mitigation measures have not been considered to reduce operational mobile source emissions from vehicles operating at the project site since project operational emissions have been determined by the lead agency to be significant. Further, since there are many warehouse distribution facility projects under consideration within the city, the AQMD staff encourages the lead agency to establish uniform enforceable operational mitigation that go beyond existing rules and regulations to reduce mobile source impacts from the proposed project. Details regarding these comments and others follow in the attachment.

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.

Mr. Jeff Bradshaw,
Associate Planner

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November 5, 2012

Sincerely,

A handwritten signature in black ink that reads "Ian V. MacMillan". The signature is written in a cursive style with a large initial "I" and "M".

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

IM:GM
Attachment

SBC120925-03
Control Number

Operational Mitigation Measures

1. In the air quality analysis, the lead agency has determined that regional air quality impacts from project operations will substantially exceed recommended regional thresholds for VOC and NO_x, mostly attributed to mobile source tailpipe emissions from vehicles operating at the proposed facility. The lead agency then determined that feasible mitigation measures were unavailable to the lead agency or the project applicant to reduce these emissions. AQMD staff encourages the lead agency to develop a common set of measures that are enforceable and that reduce emissions to the maximum extent feasible since many warehouse projects are under consideration in the city. The mitigation measures proposed by the lead agency in the Draft EIR to reduce diesel particulate matter emissions on page 4.3.75 will only minimally reduce emissions from trucks. AQMD staff notes that in order to meet air quality standards as required by 2023, NO_x emissions must be reduced by approximately two thirds beyond existing rules and regulations. The largest source of NO_x emissions in our basin are heavy duty trucks. Without meeting air quality standards, our region faces federally mandated sanctions, including possible loss of transportation funding.

AQMD staff therefore recommends that the lead agency consider the feasibility of the following additional measures to reduce project impacts. Other lead agencies that have used measures similar to these include the City of Banning¹, Riverside County², City of San Bernardino³, the San Pedro Bay Ports⁴, and the VIP Moreno Valley Warehouse Project⁵, among others.

Recommended additional measures:

- Lease/purchase documents shall identify that tenants required to implement the following:
 - 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.
- Provide a phase-in schedule and goals for the introduction of zero or near-zero technology trucks (e.g., 10% by 2020, 20% by 2025, etc.) that visit warehouses.

¹ Banning Business Park

<http://banning.ca.us/archives/30/July%202013,%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/blobdownload.asp?BlobID=11793>

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

⁵ VIP Moreno Valley Project Final EIR, Starting on page 71 (Suggested Mitigation Measures Incorporated by the Lead Agency) <http://www.moval.org/misc/vip-eir060420.shtml>.

- 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 onsite 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 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.
- 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.
- Post signs outside of the facility providing a phone number where neighbors can call if there is a specific issue.
- 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.
- Requiring all on-site vehicles (hostlers, forklifts, etc.) to utilize zero or near-zero emission technology.
- Use street sweepers that comply with SCAQMD Rules 1186 and 1186.1.

- Install solar panels on all available roof space. If this isn't feasible, then at a minimum all buildings and electrical infrastructure should be designed to accommodate potential future solar panel upgrades.

Vehicle Fleet Mix

2. In the air quality analysis and traffic and circulation sections of the Draft EIR, the lead agency cited vehicle fleet percentage inputs by truck category based on the Fontana Truck Trip Generation Study published in August 2003 (Fontana Truck Study). The recommended truck fleet mixture percentages from the Fontana Truck Study assumed 6.1 percent 2-axle trucks, 13.9 percent 3-axle trucks, and 34.0 percent 4-axle trucks totaling 54 percent. In the CalEEMod land use emissions model, however, the lead agency has input the following fleet mixture percentages: 3.2 percent 2-axle trucks, 24.4 percent 3-axle trucks, and 26.4 percent 4-axle trucks for the 54 percent total. In the Final EIR, applicable analyses should be revised to correctly capture the emissions from each truck category consistent with the truck category percentage assumptions in the Fontana Truck Study. The lead agency methodology used should also be consistent with the CalEEMod User's Guide methodology for fleet mix in Appendix E.

Use of Non-Default Trip Rates

3. In the air quality analysis, the lead agency estimated project air quality impacts using the California Emissions Estimator Model (CalEEMod) land use software using a non-default trip rate of 1.44 trips per 1,000 square feet of building area for the land use high-cube warehouse (Land Use Code 152)⁶. As stated in Appendix E (Technical Source Documentation) in the CalEEMod User's Guide and absent a tenant-specific traffic study, a reasonable worst case trip rate would be the recommended default rate of 2.59 trips per 1,000 square feet. In order to avoid underestimating the number of project trips, the AQMD staff recommends that the lead agency re-evaluate air quality impacts using the default 2.59 trip rate as described in Appendix E of the CalEEMod User's Guide. The AQMD staff believes that the 2.59 trip rate is also more applicable to project-specific analyses. The 1.44 trip rate is a less conservative average rate and should be used only for multiple warehouse projects where greater than 10 warehouse facilities are being evaluated. The 1.44 trip rate would be used, for example, to estimate impacts for a general plan. If the lead agency chooses to use this non-default rate, it should add a condition to the project limiting the allowable number of trips to what is analyzed in the EIR.

⁶ AQMD staff notes that the 1.44 trip rate in the Draft EIR is derived from the ITE Trip Generation Handbook (2008). This reference has been updated this year, with a new average trip rate of 1.68.

Off-Road Construction Equipment Emissions Analysis

4. In the air quality analysis, the lead agency estimated project construction impacts using the CalEEMod land use emissions computer model. This model uses default and user-defined settings to estimate emissions based on the land use settings. The lead agency has estimated on-site, off-road equipment emissions calculated by the CalEEMod model. In the CalEEMod inputs, the lead agency has entered user comments stating reduction of load factors by 33 percent during the Construction Phase for Off-Road Equipment used in estimating off-road construction equipment emissions in the CalEEMod model. For example, the default load factor for tractors of 55 percent was reduced to 37 percent; graders from 61 percent to 41 percent; rubber tired dozers from 59 percent to 40 percent; excavators from 57 percent to 38 percent; and the load factor for scrapers from 72 percent to 48 percent in the CalEEMod model.

Based on communication with ARB staff⁷ regarding this issue, the AQMD staff believes that CARB staff does not recommend reducing the default settings in the current OFFROAD2007 without considering all parameters besides the load factor. Other parameters such as activity level, horsepower, and population all contribute to the emission factor estimate, and selectively changing only one parameter will lead to inaccurate estimates at a project level. For some equipment types, OFFROAD2007 may underestimate emissions while others may be overestimated. Because of these revisions (and others), CARB developed the new OFFROAD2011. The AQMD staff therefore recommends that the lead agency either use existing OFFROAD2007 defaults until OFFROAD2011 is incorporated into CalEEMod later this year or run OFFROAD2011 outside CalEEMod and use those results to modify the CalEEMod construction calculations. Therefore, even though the reductions might not change the lead agency's determination of significance for construction air quality impacts, these reductions related to reduced off-road equipment load factors are not recommended by the AQMD staff without further substantial evidence to support those emission reductions resulting from their use. Otherwise, the lead agency should commit to enforcing the assumed lower non-substantiated emission factors.

⁷ Personal communication with Nicole Dolney, June 1, 2012.