



South Coast Air Quality Management District

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SENT VIA E-MAIL AND USPS:

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Mitigated Negative Declaration (MND) for the Proposed PEN18-0028 – Plot Plan and PEN18-0027 – Tentative Parcel Map No. 37478 (PAMA Business Park) Project

The South Coast Air Quality Management District (SCAQMD) staff 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.

SCAQMD Staff's Summary of Project Description

The lead agency proposes to construct seven warehouse buildings totaling 252,800 square feet, as well as 28,000 square feet of office space, 349 parking spaces totaling 246,000 square feet, and 121,243 square feet of landscaping on a 15.62 acre site (proposed project). The project is located in the City of Moreno Valley. Upon review of the aerial photographs, SCAQMD staff found that residential uses are located within close proximity to the project site.

SCAQMD Staff's Summary of Air Quality Analysis

The lead agency has determined the proposed project will have less than significant impacts to regional and localized air quality during construction and operation. However, the lead agency did not prepare a mobile source health risk assessment (HRA) in order to determine if the project would have a significant effect on nearby residential uses. Please see SCAQMD staff's detailed comment and recommended mitigation measures below.

SCAQMD Staff's Comments

The lead agency found that the project is expected to generate over 100 truck trips per day.¹ Residential uses that are located in close proximity to the proposed project site may be exposed to toxic air containments, such as diesel particulate matter (DPM), from the heavy duty, diesel-fueled trucks visiting the site. SCAQMD staff is concerned about the potential health impacts on residents. Therefore, SCAQMD staff recommends that lead agency perform an HRA² for the proposed project and disclose the potential health risks associated with the project's operation in the final CEQA document.³ If significant impacts are identified, mitigation will be required pursuant to the CEQA Guidelines.⁴ Additional guidance for sitting sensitive receptors near distribution centers and other sources of air pollution can be

¹ MND: Traffic Impact Analysis Report. Page 21.

² South Coast Air Quality Management District. *Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*. Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.

³ SCAQMD has developed the CEQA significance threshold of 10 in one million for cancer risk. When SCAQMD acts as the lead agency, SCAQMD staff conducts a HRA, compares the maximum cancer risk to the threshold of 10 in one million, determines the level of significance for health risk impacts, and identifies mitigation measures if the risk is found to be significant.

⁴ CEQA Guidelines Section 15070 (b).

found in the California Air Resources Board's Air Quality and Land Use Handbook: *A Community Health Perspective*.⁵

Recommended Mitigation Measures

If the lead agency finds that the proposed project will have a significant health impact on nearby residential uses, SCAQMD staff recommends that the lead agency consider the following mitigation measures, which are intended to reduce the amount of DPM at the project site during both construction and operation.

Construction Equipment

- Require the use of construction equipment greater than 50 horsepower that can operate on alternative fuel or electric battery-power, if commercially available; at the minimum, require the use of Tier 4 construction equipment.
- Any emissions control device used by the developer/contractor shall achieve, at a minimum, 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 SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.

Diesel Truck Emissions

- Require that all trucks accessing the site are zero-emissions or near-zero emissions, if and when feasible; at a minimum, require that the building operator(s) commit to utilizing 2010 model year trucks. Additionally, consider other measures such as incentives, phase-in schedules for clean trucks, etc.
- Require trucks to use the truck route that is analyzed in the HRA of the final CEQA document; have truck routes clearly marked with trailblazer signs, so that trucks will not enter residential areas and notify operators that truck idling will be limited to no longer than five minutes or another time-frame as allowed by the California Code of Regulations, Title 13 section 2485 – CARB's Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling.
- Limit the daily number of trucks allowed at the project to the levels that were analyzed in the final CEQA document. If higher daily truck volumes are anticipated at the site, the lead agency should commit to re-evaluating the project's air quality impacts through CEQA prior to allowing higher activity levels.

Other Operational Mitigation Measures

- Require the use of electric landscaping equipment, such as lawn mowers and leaf blowers.
- Require the use of electric or alternatively fueled sweepers with HEPA filters.
- Maximize the use of "living fences" by planting trees and other vegetation that can provide a barrier between the parking lot/loading docks and nearby sensitive receptors.

Response to Comments

Pursuant to CEQA Guidelines Section 15074, prior to approving the proposed project, the lead agency shall consider the final CEQA document for adoption together with any comments received during the public review process. Please provide the SCAQMD with written responses to the comment contained herein prior to the adoption of the final CEQA document. When responding to issues raised in the comments, response should provide sufficient details giving reasons why specific comments and

⁵ California Air Resources Board. "Air Quality and Land Use Handbook: A Community Health Perspective. Page 4. Accessed at: <http://www.arb.ca.gov/ch/handbook.pdf>.

suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful or useful to decision makers and the public who are interested in the proposed project.

SCAQMD staff is available to work with the lead agency to address any air quality questions that may arise from this comment letter. Please contact Alina Mullins, Assistant Air Quality Specialist, at amullins@aqmd.gov or (909) 396-2402, should you have any questions.

Sincerely,

Michael Krause

Planning and Rules Manager

Planning, Rule Development & Area Sources

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