



South Coast
Air Quality Management District

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Draft Environmental Impact Report (Draft EIR) for the Proposed Thoroughbred Farm Project (SCH No. 2008051007, EIR No. 512)

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.

Based on a review of the draft EIR, the AQMD staff is concerned about the significant regional air quality impacts and cancer risk from the proposed project. The proposed project includes a 108.2 acre business park and approximately 1.7 million square feet of building space that includes uses that will generate approximately 1,445 daily truck trips. Given the project's close proximity to sensitive land uses and the significant air quality impacts demonstrated in the air quality analysis, the AQMD staff strongly recommends that the lead agency provide additional mitigation measures to minimize the air quality impacts from the proposed project.

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

RVC110308-02
Control Number

Construction Mitigation Measures

1. The lead agency has determined that various phases of construction would overlap at times with operations that come on line. Construction air quality impacts would therefore exceed the AQMD's daily significance threshold for volatile organic compounds (VOC), oxides of nitrogen (NOx), carbon monoxide (CO), and particulate matter (PM10 and PM2.5). The AQMD staff recommends that the lead agency consider modifying the following mitigation measures listed in the Air Quality Section starting on page 4.2-66 and adding additional mitigation measures to further reduce construction air quality impacts from the project, if applicable and feasible. Additional mitigation measures for consideration by the lead agency for off- and on-road engines and fugitive dust can also be found at http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html.

Recommended changes:

MM Air 5: The project developer shall require, by contract specification, that, all off-road construction equipment shall be electrified. In the event that the use of electric off-road equipment is not feasible the operator shall ensure that any diesel powered off-road equipment meets EPA Tier 2 or higher emissions standards according to the schedule below low sulfur or other alternative fuels or diesel powered vehicles with Tier 3 or better engines or retrofitted/repowered—to meet equivalent emissions standards as Tier 3 or better engines—be used in construction equipment. Contract specifications shall be included in project construction documents, which shall be reviewed by the Department of Building and Safety's Grading Division prior to issuance of a grading permit based on the following requirements:

- April 1, 2010, to December 31, 2011: All off-road diesel-powered construction equipment greater than 50 hp shall meet Tier 2 off-road emissions standards. In addition, all construction equipment shall be outfitted with the 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 2 or Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
- January 1, 2012, to December 31, 2014: All off-road diesel-powered construction equipment greater than 50 hp shall meet Tier 3 off-road emissions standards. 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.
- 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.

MM Air 6: To reduce fugitive dust emissions, the developer shall provide the County of Riverside with sufficient proof of compliance with Rule 403 and other dust control measures, but not limited to:

- Requiring the application of non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ≥10 days or more, assuming no rain),
- Sweeping of streets use SCAQMD Rule 1186 and 1186.1 certified street sweepers or roadway washing trucks (recommend water sweepers and trucks with reclaimed water) at the end of the day if visible soil material is carried over to adjacent roads,
- Posting and enforcement of traffic speed limits of ≥15 miles per hour or less on all unpaved roads,

Recommended additions:

- Water active sites at least twice daily;
- Apply water three times daily, or non-toxic soil stabilizers according to manufacturers' specifications, to all unpaved parking or staging areas or unpaved road surfaces;
- Reroute construction trucks away from congested streets or sensitive receptor areas;
- Pave road and road shoulders;
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation; and
- Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks, soil export).

Operational Mitigation Measures

2. Given the project's significant regional operational air quality impacts from VOC, NOX, CO, PM10 and PM 2.5 emissions and significant cancer risks from DPM emissions from diesel trucks operating at the site and that the HRA did not include potentially significant emissions from onsite idling, the AQMD staff strongly recommends adding the following mitigation measures to minimize potentially significant air quality impacts from the operational phase of the project, if feasible:

Recommended change:

~~**MM Air 13:** New sensitive land uses such as a hospital, medical offices, day care facilities, and fire stations shall not be located closer than 1,000 feet from any existing or proposed distribution center/warehouse facility which generates a minimum of 100 truck trips per day, or 40 truck trips with TRUs, or TRU operations exceeding 300 hours per week, pursuant to the recommendations in the CARB Air Quality and Land Use Handbook. Approval will be required prior to implementing development approval through review of implementing development project applications and conditions of approval to the satisfaction of the Planning Department. If new sensitive land uses cannot meet this setback, they will be designed and conditioned to include mechanical ventilation systems with fresh air filtration. For operable windows or other sources of ambient air filtration, installation of a central HVAC (heating, ventilation, and air conditioning) system that includes high efficiency filters for particulates (MERV 13 or higher) or other similarly effective systems shall be required.~~

MM Air 13: Pursuant to the recommendations in the CARB Air Quality and Land Use Handbook, the lead agency shall require a minimum of 1,000 foot buffer from on-site diesel truck activity areas to the existing sensitive land uses (residences) located southeast of the proposed project site to minimize exposure from DPM emissions from diesel truck activities at loading docks or areas on-site where queuing might occur. Since the vacant land east and south of the proposed project site is currently zoned for residential uses, prohibit siting any new sensitive land uses within 1,000 feet of the loading docks and areas on-site where trucks can potentially queue or idle.

Recommended Additions:

- Restrict operation to “clean” trucks by implementing a program requiring the use of 2010 and newer diesel haul trucks;¹
- If trucks older than 2007 model year will be used at the facility, within one year of signing a lease, require tenants of the project to apply in good faith for diesel truck replacement/retrofit grant programs such as those offered by AQMD or ARB and to use those funds if awarded;
- Design the proposed project site such that entrances and exits discourage trucks from traversing past neighbors or other sensitive receptors;

- Develop, adopt and enforce truck routes away from sensitive receptors 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;
- Re-route truck traffic by restricting truck traffic on certain sensitive routes;
- Require or provide incentives for particulate traps that meet CARB certified level 3 requirements;
- Electrify all service equipment at the facility; and
- Improve traffic flow by signal synchronization.

¹ An example clean truck program for a similar project approved by another lead agency can be found here (beginning on page 183 of 254):

<http://www.ci.banning.ca.us/archives/30/July%202013,%202010%20City%20Council%20Agenda.pdf>