



South Coast Air Quality Management District

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Draft Environmental Impact Report (Draft EIR) for the Proposed Starcrest Distribution Facility

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. The SCAQMD would also like to thank the lead agency for the additional time to submit comments.

In the project description, the lead agency proposes to expand an existing warehouse distribution facility from 232,215 to 686,223 square feet. The expansion would replace 400 temporary trailer containers with a new 454,008 square foot warehouse building located adjacent to the existing Starcrest facility. New parking lots would be built for 240 automobiles and 97 trailer parking spaces.

The AQMD staff is concerned that project cumulative impacts were not adequately addressed in the air quality analysis. Therefore, the Cumulative Impacts Section should be revised in the Final EIR and include the projects listed in the table below as well as any other foreseeable projects if those projects include diesel fueled trucks traffic that would operate near or pass by the proposed project site including where sensitive receptor areas are located in the project description.

Name	Size (MSF)	EIR Date
Oleander Industrial Park	1.2	September 2008 Final
Rider Distribution Center	0.6	April 2009 Final
Markham Business Center	1.75	June 2009 Final
Oakmont II	1.60	June 2009 Draft
Perris Ridge Commerce Center II	2.0	August 2009 Final
Rados Distribution Center	1.2	July 2011 Final
Perris Valley Commerce Center	Specific Plan	June 2011 Draft

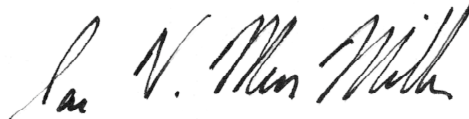
MSF – Million Square Feet

Because the proposed project is estimated to generate 142 daily diesel truck trips in addition to the thousands of truck trips generated for projects included in the table above, the AQMD staff is also concerned that cumulative long-term health risks were not adequately analyzed in the Draft EIR. Therefore, AQMD staff recommends that a community-wide health risk assessment be conducted to determine the effects on sensitive receptors and off-site workers from the increased diesel exhaust emissions prior to approving the Starcrest project. The AQMD staff is also

concerned that the trip rates used in the air quality analysis for operations and health effects may be underestimated, that the non-standard load factors used to estimate off-road construction equipment emissions are not supported by substantial evidence, and that all feasible mitigation measures have not been considered to address the direct and cumulative impacts to sensitive receptors and workers near the project area. Finally, the AQMD staff notes that sensitive receptors are located north of the proposed project site along Ramona Expressway. The Final EIR should clarify how the lead agency would enforce its restriction of project truck traffic from using an existing truck route on Ramona Expressway to access I-215. Additional details are included as an 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.

Sincerely,

A handwritten signature in black ink, appearing to read "Ian V. MacMillan". The signature is fluid and cursive, with the first name "Ian" being particularly prominent.

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

Attachment
IM:GM

RVC111013-03
Control Number

Air Quality Analysis

1. In the air quality analysis, the lead agency used the California Emissions Estimator Model (CalEEMod) land use software to estimate project air quality impacts including operations. In the land use operational inputs to the model, the lead agency assumed an average trip rate of 1.44 trips per 1,000 square feet of building area for the land use Unrefrigerated Warehouse (No Rail). Upon review of Appendix D Default Data Tables in the CalEEMod User's Guide, the trip rate for this land use should be 2.59 trips per 1,000 square feet. Therefore, the AQMD recommends that any applicable analysis (modeling for operations, health effects, etc.) be revised in the Final EIR to reflect the more conservative trip rate. If the lower trip rate is used in the Final EIR, then the lead agency should require that this lower level of trucking related to the project is an enforceable project condition.

In addition, as this project may handle goods coming directly from the ports of Los Angeles and Long Beach and potentially serving out of state destinations, the lead agency should revise the truck trip length from 7.3 miles per trip to 80 miles per trip to account for this additional trucking activity. Otherwise, long-term project air quality impacts for operations and health effects will be substantially underestimated.

2. In the air quality analysis, the lead agency estimated project short- and long-term air quality impacts using CalEEMod. This model uses default and user-defined settings to estimate emissions based on the land use settings. Upon review of the inputs to the model's off-road equipment list, the lead agency has modified the default settings for the load factor listed for the types of off-road equipment selected reducing each default load factor by a factor of about one third, effectively lowering the emissions calculated from these emission sources by one third. For example, the CalEEMod default load factor for a rubber tired dozer is 0.59; a grader is 0.61; and a scraper has a load factor of 0.72. In the air quality analysis, the lead agency used 0.40 as a load factor for rubber tired dozer; 0.41 for a grader; and 0.48 as a load factor for a scraper. These edits to load factors are not recommended by the AQMD staff without substantial evidence to support their use. If the lead agency would like to take credit for recent ARB Rulemaking, the newer OFFROAD 2011 model should be used. Otherwise, the lead agency should commit to enforcing the assumed lower emission factors or use the default load factors provided in CalEEMod.

Operational Mitigation Measures

3. Because of the potentially significant project operational impacts and cumulative impacts, the AQMD staff strongly recommends that the lead agency consider the following additional mitigation measures to address the cumulative impacts to sensitive receptors in the area for all new warehouse projects within its jurisdiction prior to certifying the Final EIR for the Starcrest Distribution Facility Expansion.

Other lead agencies that abide by similar measures include the City of Banning¹ and the Ports of Los Angeles and Long Beach².

- Beginning in 2012, all heavy duty trucks entering the property must meet or exceed EPA 2007 engine emission standards
- Beginning in 2015, 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.
- The facility operator will maintain a log of all trucks entering the facility to ensure that on average, the daily truck fleet meets that emission standards listed above. This log should be available for inspection by city staff at any time.
- The facility operator will ensure that site enforcement 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 Course #512)].
- Limit the daily number of trucks allowed at each facility to levels analyzed in the Final EIR.
- Require at least a portion of the fleet to utilize alternative fueled off-road equipment.
- Create a buffer zone of at least 300 meters (roughly 1,000 feet), which can be office space, employee parking, greenbelt, etc. between the warehouse and sensitive receptors.
- Prohibit all vehicles from idling in excess of five minutes, both on- and off-site.
- Have truck routes clearly marked with trailblazer signs, so trucks will not enter residential areas.

Construction Mitigation Measures

4. If the lead agency finds that construction impacts would be significant after considering comment #2 above, the following mitigation measures should be considered:
 - Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export) and if the lead agency determines that 2010 model year or newer diesel trucks cannot be obtained the lead agency shall use trucks that meet EPA 2007 model year NOx and PM emissions requirements,

¹ Banning Business Park MND and Conditions of Approval
<http://banning.ca.us/archives/30/July%2013,%202010%20City%20Council%20Agenda.pdf>

² Clean Trucks Program <http://www.cleanairactionplan.org/cleantrucks/>

- During project construction, all internal combustion engines/construction, equipment operating on the project site shall meet EPA-Certified Tier 2 emissions standards, or higher according to the following:
- Project Start, to December 31, 2014: All offroad diesel-powered construction equipment greater than 50 hp shall meet Tier 3 offroad emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor 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 offroad 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 SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.
- Encourage construction contractors to apply for AQMD "SOON" funds. Incentives could be provided for those construction contractors who apply for AQMD "SOON" funds. The "SOON" program provides funds to accelerate clean up of off-road diesel vehicles, such as heavy duty construction equipment. More information on this program can be found at the following website:
<http://www.aqmd.gov/tao/Implementation/SOONProgram.htm>

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 .

Project Truck Traffic Restrictions on Ramona Expressway

5. The AQMD staff notes that sensitive receptors are located north of the proposed project site along Ramona Expressway. In the lead agency's current General Plan, the Circulation Element shows that Ramona Expressway is designated as a truck route, although the Traffic Study (LSA, July 15, 2011) states on page one that "...trucks would not be permitted on Ramona Expressway but would be routed south on Brennan Avenue, east to Indian Avenue, and will access I-215 at Harley Knox Boulevard." Since using the proposed route described in the Traffic Study would be less direct than simply using Ramona Expressway to access the 215 Freeway from the project site, the AQMD staff recommends that the lead agency clarify how this policy would be enforced and include a description of that enforcement in a mitigation measure.