



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

E-mailed: April 15, 2010

April 15, 2010

Mr. Jeff Bradshaw, Associate Planner
City of Moreno Valley
Community Development Department
14177 Frederick Street
Moreno Valley, CA 92552-0805

Courtesy Review of the Air Quality Analysis (AQA) Report for the Vogel Distribution Warehouse (Plot Plan PA09-0004)

The South Coast Air Quality Management District (AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are based on SCAQMD's staff's preliminary review of the proposed project's Air Quality Analysis (AQA) Report and are intended to provide guidance to the lead agency in its preparation of a Revised or Final AQA Report. The following comments do not constitute public comments pursuant to Section 15087 and 15088 of the California Environmental Quality Act (CEQA) Guidelines.

The AQMD staff is concerned that the lead agency uses unsubstantiated information that could severely underestimate potential air quality impacts in its air quality analysis. For example, the lead agency states that only ten percent of the proposed project will be painted but fails to provide a detailed technical analysis that demonstrates the basis for this assumption. Also, the lead agency assumes a reduced vendor trip rate during project construction, reduced trip lengths and a unique trip distribution during the operational phase of the project. However, the lead agency fails to provide adequate technical data to demonstrate the proposed project's trip activities. The lead agency should also provide enforceable mitigation conditions for any project features (such as those specified above) that reduce air quality impacts.

Without providing substantial technical data and information necessary to quantify air quality impacts from the project, the lead agency is unable to support its conclusion that the project's air quality impacts are not significant. Given that the project includes a substantial amount of construction activities and could generate considerable diesel emissions from local and regional truck trips during operation a fair argument can be made that the proposed project has the potential to generate significant adverse air quality impacts.

Further, AQMD staff notes that the AQA Report did not include the input and output files necessary to review the localized air quality analysis and the Health Risk Assessment (HRA) for the proposed project, as a result, AQMD staff was unable complete its review

of the AQA Report. AQMD staff requests that the lead agency provide the AQMD with any future environmental documents prepared for the proposed project including technical data used to quantify air quality impacts and all input and output modeling files. AQMD staff is available to work with the lead agency to address any issues identified herein and any other questions that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding these comments.

Sincerely,



Ian MacMillan

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

Attachment

IM:DG

SBC091201-05
Control Number