



South Coast
Air Quality Management District

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E-mailed: February 25, 2010
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Review of Consultation Notice for Cases
PA11-001 through PA11-007, P11-004 and P11-005

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 AQMD staff's review of the tentative parcel map for the proposed project. Specifically, these comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the draft environmental impact report (EIR). Please send the AQMD a copy of the draft EIR upon its completion. Note that copies of the draft EIR submitted to the State Clearinghouse are not forwarded to the AQMD. Please forward a copy of the draft EIR directly to AQMD at the address in our letterhead. In addition, please send with the draft EIR all appendices or technical documents related to the air quality and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files. These include original emission calculation spreadsheets and modeling files (not Adobe PDF files). Without all files and supporting air quality documentation, the AQMD will be unable to complete its review of the air quality analysis in a timely manner. Any delays in providing all supporting air quality documentation will require additional time for review beyond the end of the comment period.

Operational Air Quality Analysis

The AQMD staff is concerned about the proposed project site located in close proximity to residential uses (i.e., sensitive land uses). Specifically, the proposed project is adjacent to a residential community (i.e., sensitive land use) on Iris Avenue and a half mile south of residences on Heacock Avenue. Given the project proposal the AQMD staff is concerned about the potential significant operational air quality and health risk impacts to

residents in the project area from the high volume of diesel truck traffic that could be generated by the project. Therefore, the AQMD staff recommends that the lead agency prepare an air quality analysis that includes the project's air quality impacts and health risk impacts from operational activities. The lead agency should also consider using the applicable large warehouse and distribution center trip rates provided in Appendix E (Technical Source Documentation) of the CALEEMOD User's Guide¹ as these rates seem most appropriate given the project description made available to AQMD staff.

The project's operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust) from worker trips and warehouse deliveries. All air quality impacts from indirect sources, that is, sources that generate or attract vehicular trips should be included in the analysis.

Construction Air Quality Analysis

Further, the lead agency should quantify any potential adverse air quality impacts that could occur from the construction (including demolition, if any) phase of the project. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips).

Localized Air Quality Analysis

In addition to analyzing regional air quality impacts the AQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LST's can be used in conjunction with the recommended regional significance thresholds to determine whether ambient air quality standards are exceeded locally when preparing a CEQA document. Therefore, when preparing the air quality analysis for the proposed project, it is recommended that the lead agency perform a localized significance analysis by either using the LSTs developed by the AQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>.

Guidance for the Health Risk Assessment

Guidance for performing a mobile source health risk assessment ("Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis") can be found on the AQMD's CEQA web pages at the following internet address: http://www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.html. An analysis of

¹ <http://www.aqmd.gov/caleemod/doc/AppendixE.pdf>

all toxic air contaminant impacts due to the decommissioning or use of equipment potentially generating such air pollutants should also be included.

Design and Mitigation Measures

Given that similar projects generate significant diesel emissions from trucks the AQMD staff recommends that the lead agency consider including a measure in the draft EIR that requires a clean truck fleet to minimize the project's air quality impacts. A clean truck fleet should include a mix of vehicles that are 2007 or 2010 compliant vehicles. Further, if the project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate significant adverse air quality impacts. To assist the lead agency with identifying possible mitigation measures for the project, please refer to Chapter 11 of the AQMD CEQA Air Quality Handbook for sample air quality mitigation measures. Additional mitigation measures can be found on the AQMD's CEQA web pages at the following internet address:

www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html

AQMD's Rule 403 – Fugitive Dust and the Implementation Handbook also contains numerous measures for controlling construction-related emissions that should be considered for use as CEQA mitigation if not otherwise required. Other measures to reduce air quality impacts from land use projects can be found in the AQMD's Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning. This document can be found at the following internet address:

<http://www.aqmd.gov/prdas/aqguide/aqguide.html>. Additionally, guidance on siting incompatible land uses can be found in the California Air Resources Board's (CARB) Air Quality and Land Use Handbook: A Community Perspective, which can be found at the following internet address: <http://www.arb.ca.gov/ch/handbook.pdf>. CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process. Pursuant to state CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed.

Data Sources

AQMD rules and relevant air quality reports and data are available by calling the AQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available via the AQMD's World Wide Web Homepage (<http://www.aqmd.gov>).

Contact Information

The AQMD is willing to work with the lead agency to ensure that project-related emissions are accurately identified, categorized, and evaluated, and that air quality

impacts are minimized. If you have any questions regarding this letter, please contact Dan Garcia, Air Quality Specialist, CEQA Section, at (909) 396-3304.

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

Attachment

IM:DG

SBC091201-05
Control Number