



South Coast Air Quality Management District

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Draft Environmental Impact Report (Draft EIR) for the Proposed Moreno Valley Logistics Center

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 EIR.

The lead agency proposes construction and operation of approximately 1,736,180 square feet (sf) of warehouse/light industrial/business park uses on approximately 73.4 acre site. The project will consist of approximately 1,351,763 sf of High-cube warehouse/Distribution and 384,417 sf of General Light Industrial uses. The proposed project could generate a total of approximately 2,427 daily trips including 1,738 daily truck trips operating to and from the site. The lead agency estimated that the project's construction and operational air quality impacts would be significant and unavoidable.

The lead agency also conducted a Health Risk Assessment (HRA) to determine the long-term air quality impacts from vehicles operating at the proposed project. The HRA found that maximum cancer risk from the project is 9.5 in one million, which is less than the SCAQMD significance threshold of 10 in one million. The SCAQMD staff has concerns about the assumptions used in the modeling, which likely underestimates the health risks. Additionally, SCAQMD staff has concerns about the effectiveness of the proposed construction mitigation measures. Since the lead agency has determined that project air quality impacts exceed the SCAQMD staff recommended daily significance thresholds during construction and operations, the SCAQMD recommends additional mitigation measures in addition to the measures proposed by the lead agency in the Draft EIR. Details are included in the attachment.

Pursuant to Public Resources Code Section 21092.5, SCAQMD staff requests that the lead agency provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the FEIR. Further, staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Jack Cheng, Air Quality Specialist CEQA Section, at (909) 396-2448, if you have any questions regarding the enclosed comments.

Sincerely

Jillian Wong

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Planning, Rule Development & Area Sources

JW:JC

RVC160727-05

Control Number

ATTACHMENT

Localized Significance Thresholds and Health Risk Assessment (HRA) Analyses

1. Receptor locations should be placed at the boundaries of the residential, worker, or school property and not the structure. Placing receptors in the center of the structures likely underestimates cancer risks from the project. SCAQMD staff recommends that the lead agency revise the HRA using appropriate receptor grids and locations.

Construction Mitigation Measures

2. SCAQMD staff recommends adding the following mitigation measure:
 - Construct or build with materials that do not require painting or use pre-painted construction materials.
3. SCAQMD staff recommends that mitigation measure MM 4.3-2 be replaced with the following construction Mitigation Measures:
 - All off-road diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission 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.
 - Alternatively, the lead agency could rely on the Green Construction Policy¹ used by LA County Metro or the ports of Los Angeles/Long Beach. These policies include provisions to ‘step down’ from Tier 4 equipment to Tier 3 or Tier 2 if specified criteria are met.
 - Require the use of electricity from power poles rather than temporary diesel or gasoline power generators.
4. Since the Project is considered a large operation (50 acre sites or more of disturbed surface area; or daily earth-moving operations of 3,850 cubic yards or more on three days in any year) in the South Coast Air Basin, the lead agency is required to comply with all SCAQMD Rule 403(e) – Additional Requirements for Large Operations. This may include but not limited to Large Operation Notification, appropriate signage, additional dust control measures, and employment of a dust control supervisor that has successfully completed the Dust Control in the South Coast Air Basin training class. Therefore, the Final EIR should contain a detailed description of how the Project will comply with [Rule 403\(e\)](#). Please contact dustcontrol@aqmd.gov for more information.

¹ Los Angeles County Metropolitan Transportation Authority, July 21, 2011:
<http://www.metro.net/about/search/?q=green%20construction%20policy>

Additional requirements include but are not limited to:

- Implementation of Table 2 of Rule 403 at all times and implementation of the actions specified in Table 3 of Rule 403 when applicable.
- Submittal of a fully executed Large Operation Notification to the Executive Officer.
- Maintenance of daily records to document the specific dust control actions taken.
- Installation and maintenance of project signage with project contact person that meets the minimum standards of Rule 403 Implementation Handbook.
- Identification of a dust control supervisor that has completed the AQMD Fugitive Dust Control Class.

Operational Mitigation Measures

In order to further reduce air quality impacts from operation, the SCAQMD staff recommends adding the following mitigation measures:

5. Provide minimum buffer zone of 300 meters (approximately 1,000 feet) between truck traffic and sensitive receptors.
6. Limit the daily number of trucks allowed at each facility to levels analyzed in the Final EIR. If higher daily truck volumes are anticipated to visit the site, the lead agency should commit to re-evaluating the project through CEQA prior to allowing this higher activity level.
7. Similar to the City of Los Angeles requirements for all new projects, the SCAQMD staff recommends that the lead agency require at least 5% of all vehicle parking spaces (including for trucks) include EV charging stations².

Discussion

Trucks that can operate at least partially on electricity have the ability to substantially reduce the significant NOx impacts from this project. Further, trucks that run at least partially on electricity are projected to become available during the life of the project as discussed in the 2016 Regional Transportation Plan. It is important to make this electrical infrastructure available when the project is built so that it is ready when this technology becomes commercially available. The cost of installing electrical charging equipment onsite is significantly cheaper if completed when the project is built compared to retrofitting an existing building. Therefore, the SCAQMD staff recommends the lead agency require the proposed warehouse and other plan areas that allow truck parking to be constructed with the appropriate infrastructure to facilitate sufficient electric charging for trucks to plug-in.

² http://ladbs.org/LADBSWeb/LADBS_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf