



South Coast
Air Quality Management District
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E-Mailed: May 1, 2012
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Mr. John Terell
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City of Moreno Valley
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Review of the Draft Specific Plan for the Proposed World Logistics Center Project

The South Coast Air Quality Management District (AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are intended to provide guidance to the lead agency and should be considered prior to approving the Final Specific Plan.


The Draft Specific Plan includes various design and infrastructure guidelines for the proposed 2,684 acre World Logistics Center project. This development will include up to 41.6 million square feet of new high cube warehousing. There are a number of references to sustainable design in the Draft Specific Plan; however there is no mention of how the project would impact air quality. Because this goods movement project will utilize a substantial number of trucks, there is the potential for significant regional and local air quality impacts from truck emissions.

While the project-specific air quality analysis has not been provided to our agency with the Draft Specific Plan (SP), there are a number of features in the Draft SP that may affect air quality that warrant comments at this early planning stage. For example, the Draft SP already has specified buffer zones between trucking activities and homes before presenting an air quality analysis demonstrating that the setback appropriately protects public health. Further, the Draft SP contains no discussion of alternative fueling infrastructure for trucks (such as natural gas or electricity), or onsite renewable power generation. Lastly, specific requirements could be added to the Draft SP that will help minimize any potential air quality impacts such as support services for truckers and limits on trucking activity that coincide with the EIR analysis. Details regarding these comments are attached below. AQMD staff recommends that the lead agency consider the attached comments and incorporate them as appropriate into the Specific Plan and the Environmental Impact Report.

Please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final Specific Plan. Further, staff is available to work with the lead agency to

address these issues and any other questions that may arise. Should you have any questions regarding these comments, please contact me at (909) 396-3244.

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

RVC120413-10
Control Number

1) Buffer Zones Between Trucking Areas and Homes

Based on a review of the Draft Specific Plan (e.g., Street Sections B, C, and E), it appears that areas with heavy duty diesel trucking activity (such as roadways and loading dock areas) may be planned as close as approximately 250 feet from homes. In addition, Sections 8 and 9 of the Draft Specific Plan describe setback distances between buildings and residences or streets, but do not include specific setbacks from areas of diesel trucking activity. According to the California Air Resources Board guidance¹, without more project-specific information, sensitive land uses such as homes should maintain a buffer zone of up to 1,000 feet from distribution centers with more than 100 trucks per day or 40 trucks per day with operating diesel transportation refrigeration units. AQMD staff recommends that an air quality Health Risk Assessment (HRA) be prepared that analyzes the cumulative impact of all approved and proposed warehouses in the vicinity before determining the appropriate buffer zone distances. Further, setback distances should be specified between areas of diesel trucking activity and sensitive land uses.

2) Alternative Fueling/Energy Infrastructure

The Draft Specific Plan contains some details regarding utility infrastructure such as natural gas lines and electrical infrastructure. Because this logistics center is proposed to be a major new destination and/or origin of goods movement in the region, AQMD staff encourages the lead agency to begin planning now for alternative fueling infrastructure for the trucks serving this development. This could include natural gas fueling infrastructure and/or electrical charging infrastructure. As an example, the 2012 Regional Transportation Plan includes a proposal for a zero or near zero emissions freight corridor parallel to State Route 60 between I-710 and I-15. As many of the trucks serving the proposed project will likely use this route, there should be infrastructure in place onsite that will help facilitate these alternatively fueled trucks. AQMD staff recommends that the Specific Plan include requirements that infrastructure for alternative fueling be provided at project start up.

Further, the Draft Specific Plan estimates that the development may need up to 147 MW of electrical demand. In order to reduce the demand on local power generating stations (that have emissions of air pollution), the project should require that the abundant roof space of these high cube warehouses be used for solar energy generation such as photovoltaic panels. Lastly, the Draft Specific Plan should require that any facilities served by trucks with transportation refrigeration units (TRUs) include electrical infrastructure so that the TRUs can plug in and run off of electrical power instead of diesel while at the facility. The estimated electrical usage value of 147 MW should also be reviewed to determine if more is needed to serve electric TRU's and electric trucks.

3) Truck Trip Rates

In order to ensure that the Environmental Impact Report (EIR) prepared for this project does not underestimate air quality impacts, the lead agency should put a requirement in the Specific Plan that places a limit on the number of trucks that serve the project site at a plan level to not exceed what is analyzed in the EIR.

¹ *Air Quality and Land Use Handbook: A Community Health Perspective*, available here: <http://www.arb.ca.gov/ch/handbook.pdf>

4) Trucking Industry Support Services

The proposed project includes only two land use designations for the logistics portion of the project including a Logistics Development category and a Light Logistics category. Neither of these land use categories permits any support services for the trucking industry such as food, fueling, lodging, truck repair, etc. Consistent with the Western Riverside Council of Governments guidance², AQMD staff recommends that the lead agency provide these kinds of services onsite in order to reduce the amount of trucking activity (with its associated emissions) outside of the project site.

² Good Neighbor Guidelines for Siting New and/or Modified Warehouse/Distribution Facilities
Available here: <http://www.wrcog.cog.ca.us/downloads/Good+Neighbor+Policies+Final-091205.pdf>