



South Coast Air Quality Management District

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Ms. Julia Descoteaux
Community & Economic Development Department
City of Moreno Valley
14177 Frederick Street
Moreno Valley, CA 92553

Review of the Draft Environmental Impact Report (Draft EIR) for the Proposed First Nandina Logistics Center Project

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 Environmental Impact Report (Final EIR) as appropriate.

The SCAQMD staff is concerned about the significant regional operational air quality impacts identified in the Draft EIR from the proposed project. Therefore, the SCAQMD staff recommends that the Lead Agency incorporate additional mitigation measures in the Final EIR that minimize the project's significant air quality impacts pursuant to Section 15126.4 of the California Environmental Quality Act (CEQA) Guidelines. Further, SCAQMD staff recommends that the Lead Agency revise or substantiate the methodology used to determine the project's trip generation rates to be consistent with the SCAQMD recommended CEQA interim measure for assessing trip rates from high cube warehouses. Details regarding these comments are attached to this letter.

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 Final EIR. Further, staff is available to work with the

Lead Agency to address these issues 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 the enclosed comments.

Sincerely,

A handwritten signature in cursive script, appearing to read "Ed Eckerle".

Ed Eckerle
Program Supervisor
Planning, Rule Development & Area Sources

Attachment

EE:DG

SBC140626-11
Control Number

Mitigation Measures for Operational Air Quality Impacts (Mobile Sources)

1. The operational air quality analysis provided in the Draft EIR demonstrates significant regional air quality impacts from NO_x and VOC emissions. These impacts are primarily (over 90%) from mobile source emissions related to vehicle trips associated with the proposed project. However, the Draft EIR does not adequately address this large source of emissions and only requires a list of nominal mobile source mitigation measures. Therefore, SCAQMD staff recommends the Lead Agency reduce the project's significant air quality impacts by incorporating additional transportation mitigation measures, such as those listed below.
 - a) Require the use of 2010 and newer diesel haul trucks (e.g., goods/materials delivery trucks) 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 NO_x emissions requirements.
 - b) Improve traffic flow by signal synchronization.
 - c) Provide food options, fueling, truck repair and or convenience stores on-site to minimize the need for trucks to traverse through residential neighborhoods.
 - d) Electrify service equipment at facilities (e.g., forklifts and yard hostlers). Where it is not feasible for equipment to be electrically powered the Lead Agency should ensure that non-diesel fueled alternatives are required.

Mitigation Measures for Operational Air Quality and Greenhouse Gas Impacts (Non-Mobile Sources)

2. In addition to the mobile source mitigation measures identified above, the Lead Agency should incorporate the following onsite area source mitigation measures below to reduce the project's overall significant regional air quality impacts and GHG impacts during operation. These mitigation measure should be incorporated pursuant to CEQA Guidelines §15126.4
 - a) Require all lighting fixtures (not only street lighting), including signage, to be state-of-the art and energy efficient, and require that new traffic signals have light-emitting diode (LED) bulbs and require that light fixtures be energy efficient compact fluorescent and/or LED light bulbs. Where feasible use solar powered lighting.
 - b) Maximize the planting of trees in landscaping and parking lots (i.e., in coordination with MM 4.2-9).
 - c) Use light colored paving and roofing materials.
 - d) Use passive heating, natural cooling, solar hot water systems, and reduced pavement.
 - e) Utilize only Energy Star heating, cooling, and lighting devices, and appliances.
 - f) Install light colored "cool" roofs and cool pavements.
 - g) Limit the use of outdoor lighting to only that needed for safety and security purposes.
 - h) Require use of electric lawn mowers and leaf blowers.
 - i) Require use of electric or alternatively fueled sweepers with HEPA filters.
 - j) Use of water-based or low VOC cleaning products.

Fleet Mix/Trip Rate (Air Quality Analysis)

3. The Draft EIR relies on a project specific traffic study to determine the project's air quality impacts. The said traffic study uses trip rates other than the SCAQMD staff recommended CEQA interim measure for assessing trip rates from high cube warehouses. As a result, the SCAQMD staff recommends the Lead Agency revise the Draft EIR to include the Institute of Transportation Engineers (ITE) truck trip rate for high cube warehouses (i.e. 0.64 per 1,000 ft² of warehouse space) or provide substantial evidence to demonstrate that another rate is more appropriate for the air quality analysis, consistent with the SCAQMD's applicable CEQA interim measure.