



South Coast Air Quality Management District

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Final Program Environmental Impact Report (Final PEIR) for the Proposed World Logistics Center Project (WLC)

The South Coast Air Quality Management District (SCAQMD) staff appreciates the time that city staff and each of the city council members has taken to discuss our concerns regarding the proposed WLC project. As we have discussed in our recent meetings, there are two key air quality issues that have not been appropriately addressed in the Final PEIR (refer to our June 24, 2015 letter for details). First, the level of mitigation for truck emissions is inadequate to address the significant NO_x emissions impact from this project. Second, the city council should not make findings that rely on the misinterpretation of a single study to conclude that diesel exhaust from trucks that meet the 2010 engine emissions standard does not cause cancer.

1. Additional Mitigation for Heavy Duty Truck Emissions

As discussed in our recent meetings, it is feasible for the project to impose additional mitigation to reduce trucking emissions. The project currently requires all trucks serving the project to meet the 2010 truck standard. This measure provides a five year lag between implementation of the engine standard (2010), and approval of the project (2015). However, as existing state regulations already require nearly all trucks in our region to use 2010 trucks by 2023, before half of the project is even built out, this measure will have limited to no effectiveness for the vast majority of the project's life. In order to ensure that this project continues to mitigate emissions beyond existing requirements, the lead agency should consider the following mitigation measure:

Condition Requiring Implementation of Current Regulatory Requirements

A condition shall be added to each lease (if lessor operates the warehouse) or building title (if building owner operates the warehouse) for each warehouse building within the World Logistics Center Specific Plan (WLCSP) requiring that all heavy duty trucks serving that particular warehouse building shall implement the more stringent of either U.S. Environmental Protection Agency's (USEPA) or California Air Resources Board's (CARB) engine emissions standards for heavy-duty trucks in effect at the time of the lease or title transaction, subject to the provisions below.

- a) The warehouse operator shall fully implement the USEPA or CARB standard no later than five (5) years after either the implementation date of the standard or after the building is leased or sold, whichever is later.
- b) If an engine standard has been adopted by USEPA or CARB, but not yet implemented at the time of a lease or title transaction, the warehouse operator shall fully implement the USEPA or CARB standard no later than five (5) years after the implementation date of the standard.
- c) Warehouse operators will only be required to implement a truck engine emission standard one time.
- d) Facility operators shall maintain a log of all trucks entering the warehouse building to document that the trucks serving that building meet these emission standards. This log shall be available for inspection by City staff at any time.
- e) This condition will sunset for each building ten years after the first lease or title transaction date.

2. Misleading Discussion of Potential Health Risks

The Final PEIR misinterprets and then relies heavily on a single study published by the Health Effects Institute (HEI) to determine that “*new technology diesel exhaust does not cause cancer.*” (Final PEIR pg. 4.3-1) when making its finding that the project does not present a significant health risk. The findings of fact and the statement of overriding considerations that will be approved by the city council should not rely on this faulty scientific conclusion. Instead they should rely on the conclusions from the Final PEIR’s own industry-standard Health Risk Assessment (HRA) and the conditions that have been recommended by the Planning Commissions to add filters to homes to reduce any health risks identified in the HRA to levels below CEQA significance thresholds. At the request of some council members, we are providing with this letter a variety of studies that address the health effects of air pollution, specifically related to diesel exhaust and fine particulate matter.

We appreciate your willingness to consider these comments, and we look forward to continuing to work with you in developing strategies that can be implemented to reduce the air quality impacts of the World Logistics Center project. If you have any questions, don’t hesitate to contact me at (909) 396-3131.

Sincerely,



Barry Wallerstein, D. Env.
Executive Officer
South Coast Air Quality Management District