



South Coast Air Quality Management District

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Warehouse Projects in Moreno Valley

On September 19, 2008, the South Coast Air Quality Management District (SCAQMD) sent you a comment letter on the Highland Fairview Corporate Park Draft Environmental Impact Report (EIR), which, at final build-out, is expected to consist of over 2.4 million square feet of warehouse facilities covering a total area of 265.3 acres. According to the EIR prepared for this project, it has the potential to generate 15,339 passenger car equivalent (PCE) average daily vehicle trips at full build-out. Further, of these PCE average daily vehicle trips 1,868 are expected to be diesel truck trips hauling products to and from the facility. The diesel particulate matter (DPM) component of diesel exhaust has been classified as a carcinogen by the California Air Resources Board. Consequently, there is substantial concern over potentially locating projects that attract substantial diesel truck traffic in close proximity to sensitive receptors such as residences, schools, day care centers, etc.

The results of the cancer risk analysis for the proposed Corporate Park indicated that, with mitigation, peak cancer risks from diesel truck trips generated by the proposed project, 8.7 in one million (8.7×10^{-6}) would not exceed the SCAQMD's recommended cancer risk significance threshold of 10 in one million (10×10^{-6}). One of the mitigation measures used to reduce cancer risk impacts to less than significant. MM AQ-13 would preclude the establishment of sensitive receptors including residences, schools, hospitals, convalescent homes, day-care centers, and within the area 500 feet south of the proposed project between Redlands Boulevard and Theodore Street through deed-restrictions acceptable to the City of Moreno Valley.

The City however, is contemplating approving two additional warehouse/commercial parks in close proximity to the Highland Fairview Corporate Park. These proposed projects include the Ridge Property Trust project consisting of a one million square-foot distribution center on 50 acres and the ProLogis project consisting of a 2.2 million square-foot distribution center on 117 acres. Like the Highland Fairview Corporate Park, these projects would increase average daily vehicle trips, especially diesel truck trips, resulting in increased exposures to criteria pollutants as well as air toxics (e.g., DPM) to existing residents south of Eucalyptus Avenue and any future

projects that may include sensitive receptors in the vicinity of these proposed warehouse/distribution facilities. For example, the Moreno Valley Unified School District is currently evaluating locating three schools in close proximity to the cluster of warehouse/distribution projects, with the proposed high school located directly adjacent on two sides to the Ridge Property Trust and the ProLogis projects.

The SCAQMD's *CEQA Air Quality Handbook and Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning* both advise local land use public agencies to avoid siting incompatible land uses in close proximity to one another. In addition, SCAQMD staff recommends that the City consult the following resources when considering approval of warehouse/distribution projects:

- Good Neighbor Guidelines for Siting New and/or Modified Warehouse/Distribution Facilities: This Guideline was developed to promote and assist planning departments, developers, property owners, elected officials, community organizations, and the general public as a tool to potentially help address some of the complicated choices associated with permitting warehouse/distribution facilities and understanding the options available when addressing environmental issues. The Good Neighbor Guidelines are designed to help minimize the impacts of DPM exposures from on-road trucks associated with warehouses and distribution centers on existing communities and sensitive receptors located in the sub-region.
- Air Quality and Land Use Handbook (CARB, 2005). CARB's Handbook is intended to serve as a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process. CARB's Handbook states, "Land use agencies can use their planning authority to separate industrial and residential land uses, or to require mitigation where separation is not feasible. For example, CARB's Handbook recommends that land use agencies avoid siting new sensitive land uses within 1,000 feet of a distribution center that accommodate more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units (TRUs) per day, or where TRU unit operations exceed 300 hours per week.

In addition to avoiding siting incompatible land uses and providing appropriate buffer zones between incompatible land uses, SCAQMD staff also recommends consideration of the following measures to further mitigate potential adverse air quality impacts from warehouse/distribution centers. First, the City should require the future occupants of the proposed Highland Fairview Corporate Park and other large warehouses to use dedicated clean truck fleet using alternative clean fuels or diesel trucks that are as clean as or cleaner than year 2010 federal NO_x and PM on-road emission standards. Alternatively, if the warehouse/distribution center occupants do not own their own fleets, the City could require the project proponents to subsidize the purchase of CARB verified emission control technologies for trucks that frequently service the warehouse/distribution centers.

Finally, if the City decides to move forward with the other warehouse/distribution center projects, SCAQMD staff recommends that, as the CEQA documents are prepared for these projects, the City require a robust and detailed quantitative cumulative air quality impact analysis for each project. Detailed quantitative cumulative air quality impact analyses are essential not

only to identify potential significant cumulatively air quality impacts, but to provide sufficient measures to mitigate air quality impacts to the local community. As the agency with general land use authority, the City is in an important position to approve land use decisions, sitings and facility configurations, in ways that reduce potential health impacts to city residents as a result of air quality impacts from the projects it approves.

SCAQMD staff is willing to work with the City to identify additional methods and measures for reducing the air quality impacts from projects it approves. If you have any questions regarding this letter, please contact me at (909) 396-3105 or Dr. Steve Smith at (909) 396-3054 or by e-mail to ssmith@aqmd.gov.

Sincerely,

Susan Nakamura
Planning Manager

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