



South Coast Air Quality Management District

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Review of the Final Environmental Impact Report (Final EIR) for the Proposed Mira Loma Commerce 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 meant as guidance, and should be considered by the lead agency prior to certifying the Final EIR.

AQMD staff appreciates that the lead agency analyzed and quantified air quality impacts from the proposed project. The air quality analysis included consideration of AQMD staff written comments on the Draft EIR, and subsequent verbal comments. While the final air quality analysis may differ from AQMD recommended methodologies in some respects, the basic conclusions of the Final EIR would likely not change with further refinement to the air quality calculations. The lead agency concludes that air quality impacts and health risks remain significant and unavoidable during construction and operation. AQMD staff is concerned that the proposed project lacks feasible mitigation measures that could reduce these significant risks.

Specifically, the lead agency states in response to SCAQMD comment #13 that providing an entire 2010-compliant truck fleet is economically infeasible, hence no incentives or schedule to phase in a clean truck fleet is provided to clean up the fleet serving the project. This "all or nothing" approach to mitigation does not appear to be supported by the explanation provided in the response to comments. While a cost of 4 to 4.8 million dollars was found to be economically infeasible, it is not clear what is economically feasible. For example, the lead agency has not considered other alternatives such as whether only a portion of the fleet could be retrofitted or repowered, or whether retrofits could be phased in over a specified time period. These alternatives could substantially reduce the air quality health risks, and may be economically feasible. As the majority of operational emissions are from diesel trucks, AQMD staff recommends that the lead

agency provide a more robust feasibility analysis of providing a cleaner fleet to service this project prior to certifying the Final EIR.

AQMD staff is available to work with the lead agency to address these issues and any other air quality 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,



Ian MacMillan
Program Supervisor, CEQA Inter-Governmental Review
Planning, Rule Development & Area Sources

Attachment

IM:DG

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