



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 previously commented on the potentially significant air quality and health risk impacts from the trucks that will serve this project. Up to 720 trucks servicing this warehouse project will travel and idle adjacent to existing residences. Mitigation measures were suggested to reduce the health risk from this project, including requiring an upgraded truck fleet that utilizes control technologies to reduce diesel emissions. On February 16, the Riverside Planning Commission expressed similar concerns and asked the project applicant to consider requiring a 'clean' truck fleet for the high cube warehouses, for example one that is composed of 50% 2007-compliant trucks and 20% 2010-compliant trucks at the commencement of project operations.

The most recent staff report¹ available for the upcoming Planning Commission meeting on March 23, 2011 does not include this condition; however a recent phone conversation with county staff indicates that the applicant has committed to a 50% 2007-compliant fleet in the conditions of approval for the largest warehouse. AQMD staff appreciates that the lead agency has committed to enforcing a partial 2007 fleet for a portion of the project, but is concerned that the level of control is no greater than is expected through

¹ http://www.rctlma.org/planning/content/hearings/pc/2011/pc032311_agenda/pc032311.pdf
(accessed 3/22/11)

natural fleet turnover based on estimates from the state Air Resources Board (ARB) in the latest version of EMFAC2007. As stated at the February 16, 2011 Planning Commission hearing, the project applicant indicated that this project would likely not be occupied until about 2015. According to EMFAC2007, approximately 50% of the heavy duty truck fleet serving the South Coast air basin will already be 2007-compliant. It is important to note that this 50% estimate from EMFAC has not taken into account the recent rule enactment by ARB that requires 100% of the heavy duty truck fleet to be 2007-compliant by 2016. Furthermore, even with implementation of this new project condition, health risks are still predicted to be significant to the surrounding residences.

The lead agency has therefore not considered all feasible mitigation measures as required under Section 15092 of the CEQA Guidelines. AQMD staff strongly recommends that the lead agency consider additional feasible mitigation that could reduce the health risks to a less than significant level. These mitigation measures could include, but is not limited to, a commitment to use of 2010-compliant trucks, and/or use of LNG trucks.

Lastly, the Planning Commission requested that a policy be drafted (in consultation with AQMD) for all future warehouse projects to address potential project-related health risks. AQMD staff looks forward to working with the lead agency to find a solution that is practical and health protective.

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 me at (909) 396-3244, if you have any questions regarding the enclosed comments.

Sincerely,



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

Attachment

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