



South Coast Air Quality Management District

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SENT VIA E-MAIL:
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Community and Economic Development Department
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Final Program Environmental Impact Report (Final PEIR) for the Proposed World Logistics Center (WLC) Project

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to provide additional comments on this regionally significant project. As we have made clear in our past letters and in several meetings with city staff and council members, there are two fundamental and significant concerns we have with the proposed project.

Our primary concern is the inadequate incorporation of feasible mitigation to reduce emissions from trucks serving this project. As demonstrated in our previous comment letters, the Final PEIR does not require the cleanest trucks that are commercially available today. Further, trucks that are even cleaner than those available today are expected to become commercially available very early in the life of this project. Despite these well recognized forthcoming technological advances, the Final PEIR locks in a technology (truck engines that meet EPA's 2010 standard) for decades that will likely be outdated before even half of the project is occupied. Thus, the city's reliance on the Final PEIR's inadequate mitigation for trucks goes no further than what is already required by regulation for the vast majority of the project's life. This approach ensures little more than a business as usual path that is not consistent with the need for emission reductions to meet federal air quality standards in the South Coast Air Basin.

Our second concern is related to the misleading characterization in the Final EIR and subsequent responses to comments that indicate that exhaust from 'new technology' diesel trucks does not cause cancer. This untenable conclusion is based on a single study that has been misinterpreted in the Final EIR. In response to the strong concerns we have raised, we appreciate that the lead agency has modified its Findings of Fact to instead rely on the whole of the record, including the Final EIR's own Health Risk Assessment that uses the entire body of medical research showing the carcinogenic effect of diesel exhaust. As this conclusion is only contained within the Findings of Fact, and is contradicted by all other public statements in the response to comment letters and Final EIR itself, the lead agency must make it clear to the public at the city council hearing that it finds that diesel exhaust, including from 2010 truck engines, is carcinogenic.

In conclusion, while our second concern has been addressed to some degree, the Final EIR's inadequate inclusion of feasible mitigation to reduce emissions from trucks results in a project that does not meet the requirements of CEQA. We recommend that the lead agency delay approval of this project and consider additional measures, including those suggested by SCAQMD staff, to mitigate these significant impacts.

Sincerely,

A handwritten signature in blue ink, appearing to read "Barry R. Wallerstein".

Barry R. Wallerstein, D. Env.
Executive Officer

cc: Moreno Valley City Council