



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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Mitigated Negative Declaration (MND) for the Proposed Cottonwood & Edgemont Project (Proposed Project) Master Plot Plan PEN21-0325, Plot Plan PEN21-0326

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The City of Moreno Valley is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. The following comments recommended revisions to the EMFAC version, health risk assessment analysis, inconsistent information during grading activities, and concept design & orientation that the Lead Agency should include in the Final MND.

South Coast AQMD Staff's Summary of Project Information in the MND

Based on the MND, the Proposed Project consists of developing two 49,815 square feet of light industrial buildings with a total combined floor area of 99,630 square feet on an approximately 7.94-gross-acre property.¹ The Proposed Project locates on the east side of Old 125 Frontage Road, approximately 500 feet south of Cottonwood Avenue and approximately 620 feet north of Bay Avenue, City of Moreno Valley.² The Proposed Project would include nine (9) dock doors on the east side of each building,³ associated with 34 one-way truck trips per day.⁴ The Proposed Project would have three driveways along Old 125 Frontage Road, with the northernmost and southernmost driveways for passenger vehicles and heavy trucks to access the site.⁵ Based on the ariel photographs, South Coast AQMD staff finds that the nearest sensitive receptors (e.g., residences) are less than 20 feet north/northeast and within 60 feet east of the Proposed Project. The Proposed Project's construction is anticipated to occur over eight months, assumed to commence in February 2023 and finish in October 2023.⁶

¹ MND. Page 1.

² *Ibid.*

³ *Ibid.* Page 2.

⁴ *Ibid.* Appendix K3- Traffic Analysis. Page 37.

⁵ *Ibid.* Page 3.

⁶ *Ibid.* Page 6.

South Coast AQMD Staff's Comments on the MND

EMFAC Version

According to Appendix A – Air Quality Impact Analysis, the Proposed project's operational emissions are analyzed utilizing EMFAC2017 emissions factors to derive vehicle emissions.⁷ According to the CARB, the EMFAC 2021⁸ was officially released in January 2021. Since the Proposed Project MND was prepared in February 2023, South Coast AQMD staff recommends that the Lead Agency revise the emissions calculations utilizing the EMFAC 2021 emissions factors and include in the Final MND. If the revision is not included in the Final MND, the Lead Agency should provide reasons for not having them supported by substantial evidence in the record.

On the other hand, the Lead Agency could go a step further since CARB has updated the EMFAC 2021 v1.0.2 in April 2022,⁹ and the Lead Agency can consider using it for the revision of analysis in the Final MND. If the Lead Agency decides to use the most current updated versions of EMFAC 2021 v1.0.2, South Coast AQMD staff encourage the Lead Agency to visit CARB's website for more information.

Health Risk Assessment (HRA) Analysis

Averaging Time Utilized in Construction and Operational HRA Analysis

Based on the construction and operational HRA output files, the averaging time for the analysis is ANNUAL.¹⁰ However, according to the South Coast AQMD Risk Assessment Procedures v8.1, the detailed HRA utilizing AERMOD should be run using the averaging time PERIOD and 1-hour.¹¹ Since the construction and operational HRAs of the Proposed Project using ANNUAL, South Coast AQMD staff recommend that the Lead Agency re-run the construction and operational HRAs utilizing PERIOD and 1-hour averaging time to determine the health risk impacts to the sensitive receptors and off-site workers and include the revised results in the Final MND. If the revision is not included in the Final MND, the Lead Agency should provide reasons for not having them supported by substantial evidence in the record.

Building Downwash Option in Operational HRA Modeling

Based on the South Coast AQMD staff review, the HRA modeling file does not include the building downwash option in the operational HRA. The ground-level pollutant concentrations near the building would be underestimated if the downwash effects were absent in the dispersion modeling. Therefore, building downwash should be considered for the Proposed Project operation in order to predict more accurate ground-level concentrations. In addition, the truck idling emissions would need to be estimated separately and included in the dispersion modeling analysis and HRA as point sources. However, the operational HRA modeling file indicates those emissions as line volume source types. In addition, it needs to be clarified in the MND if the stationary

⁷ *Ibid.* Appendix A – Air Quality Impact Analysis. Page 45.

⁸ CARB EMFAC 2021. Access at: <https://arb.ca.gov/emfac>

⁹ CARB EMFAC 2021 v1.0.2. Access at: <https://arb.ca.gov/emfac>

¹⁰ *Ibid.* Appendix A – Mobile Source Health Risk Assessment. Pages 73 and 245 of PDF.

¹¹ South Coast AQMD Risk Assessment Procedures v8.1. Access at: <http://www.aqmd.gov/docs/default-source/permitting/rule-1401-risk-assessment/riskassessproc-v8-1.pdf>

combustion engines (e.g., diesel firewater pump, diesel emergency generator, etc.) will be used on-site during operation. If any of these will be used when implementing the Proposed Project, they will need to be added as additional sources to the HRA and dispersion modeling files. Therefore, South Coast AQMD staff recommend that the Lead Agency revise the operational HRA modeling by incorporating the above recommendations and including the HRA results in the Final MND. If the HRA modeling is not revised and included in the Final MND, the Lead Agency should provide reasons supported by substantial evidence in the record to explain why the revision is not included.

Inconsistent Information During Grading Activities

Under the Construction Characteristic section of the MND, the earthwork activities are expected to be balanced, and no import or export of soil materials would be required.¹² However, Appendix A – Air Quality Impact Analysis discloses that the Proposed Project is anticipated to require 10,600 cubic yards of export¹³ during grading activities. Furthermore, California Emissions Estimator Model (CalEEMod) output files show hauling truck trips associated with the grading activities, confirming the material information export discussed in Appendix A. Due to the inconsistency, South Coast AQMD staff recommends that the Lead Agency revise the export/import information and include the revision in the Final MND to avoid discrepancies throughout the Final MND and its appendices. If the revision is not included in the Final MND, the Lead Agency should provide reasons for not having them supported by substantial evidence in the record.

Concept Design and Orientation

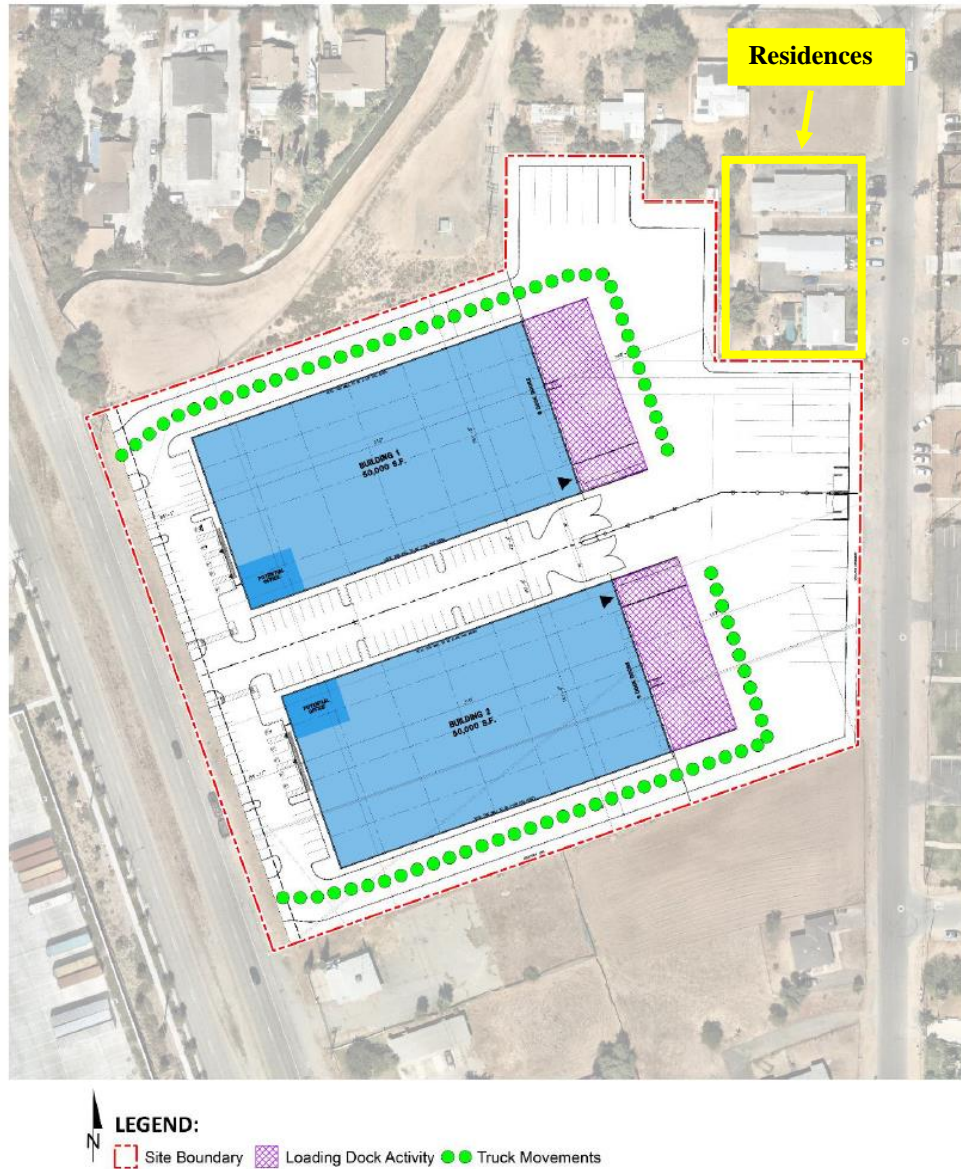
Based on the MND, the Proposed Project would have nine (9) dock doors located on the east side of each building.¹⁴ Based on the aerial photograph and Figure A below, South Coast AQMD staff is concerned about the loading dock orientation of the Proposed Project. These loading docks face Edgemont Street, where sensitive receptors (e.g., residences) are located, as noted in Figure A.

¹² *Ibid.* Page 6.

¹³ *Ibid.* Appendix A – Air Quality Impact Analysis. Page 39.

¹⁴ *Ibid.* Page 2.

Figure A
Loading Docks and Truck Movements¹⁵



As a result, South Coast AQMD staff recommends that the Lead Agency re-consider the Proposed Project buildings’ design/orientation, such as placing loading docks further away from the sensitive receptors, to help reduce the impacts of the operational activities on the sensitive receptors. In the event that the Proposed Project’s design is revised, the Lead Agency should include the new design and its associated analysis (e.g., emissions calculations, HRA) in the Final MND.

¹⁵ *Ibid.* Appendix A – Mobile Source Health Risk Assessment. Page 16.

Conclusion

Pursuant to CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process. Please provide South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, responses should provide sufficient details giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision-makers and the public who are interested in the Proposed Project.

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Danica Nguyen, Air Quality Specialist, at dnguyen1@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

Sam Wang

Program Supervisor, CEQA-IGR

Planning, Rule Development & Implementation

SW:DN

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