



# South Coast Air Quality Management District

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## **Draft Subsequent Environmental Impact Report (DSEIR) for the Proposed Moreno Valley Mall Redevelopment Project (Proposed Project) (State Clearinghouse No.: 2022040136)**

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 Lead Agency under the California Environmental Quality Act (CEQA) for the Proposed Project. The following comments on the health risk assessment (HRA) should be included in the Final SEIR.

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

Based on the DSEIR, the Proposed Project includes a specific plan amendment to amend Specific Plan No. 200 – Towngate Specific Plan (SP-200) to allow a mix of retail and residential land uses within the planning area of SP-200.<sup>1</sup> The Proposed Project encompasses approximately 58.6 acres<sup>2</sup> and is within 130 feet south of State Route 60 (SR-60).<sup>3</sup> Construction will occur over 3 years and 8 months with full buildout of the Proposed Project anticipated by late 2026.<sup>4</sup> Once completed, the Proposed Project anticipates a new growth of approximately 60,000 square feet of office space, 270 hotel rooms, 1,627 multi-family residential units, and 1.9 acres of open space.<sup>5</sup> The Proposed Project is located on the southwest corner of Centerpoint Drive and Towne Circle in the City of Moreno Valley, Riverside County, California.

### South Coast AQMD Staff's Comments on the DSEIR

#### *Sensitive Receptors and HRA*

Sensitive receptors are people that have an increased sensitivity to air pollution or environmental contaminants and include schools, daycare centers, nursing homes, elderly care facilities, hospitals, and residential dwelling units. The Proposed Project will include, among others, 1,627 residential dwelling units. Implementation of the Proposed Project would result in new development of such sensitive land uses within 170 feet of the SR-60 freeway.<sup>6</sup>

Notwithstanding the court rulings, South Coast AQMD staff recognizes that the lead agencies that approve CEQA documents retain the authority to include any additional information they deem relevant to assessing and mitigating the environmental impacts of a project. Because of South Coast AQMD staff's concern about the potential public health impacts of siting sensitive populations within close proximity of freeways or other sources of air pollution, South Coast AQMD staff recommends that, prior

<sup>1</sup> DSEIR. 2.0 Introduction and Purpose. Page 2-1.

<sup>2</sup> *Ibid.* 3.0 Project Description. Page 3-1.

<sup>3</sup> *Ibid.* Page 3-2.

<sup>4</sup> *Ibid.* Page 3-10.

<sup>5</sup> *Ibid.* Page 3-6.

<sup>6</sup> *Ibid.* 4.2 Air Quality. Page 4.2-38.

to approving future development projects, the lead agency consider the impacts of air pollutants on people who will live in a new project and provide mitigation where necessary.

The California Air Resources Board's (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective*<sup>7</sup> is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process. Additional guidance on strategies to reduce air pollution exposure near high-volume roadways is available in CARB's technical advisory.<sup>8</sup> In CARB's Air Quality and Land Use Handbook, page 4, Table 1-1, under the Source Category of Freeways and High-Traffic Roads, the recommendations advise against siting new sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles/day. The basis for the recommendation made in Table 1-1 comes from California freeway studies that show a 70% drop off in particulate pollution levels at 500 feet.<sup>9</sup> Sensitive receptors in close proximity to freeways and high-traffic roads are shown to have increase cancer risks of 300 to 1,700 in one million.<sup>10</sup>

#### *Future Project-level HRA*

The Lead Agency conducted an operation HRA to analyze the potential cancer risk on future sensitive receptors located on the Proposed Project site from mobile source emissions from adjacent SR-60.<sup>11</sup> The results show a maximum cancer risk of 9.36 per million for on-site resident exposure (and 2.63 per million for on-site worker exposure),<sup>12</sup> which is less than the South Coast AQMD's CEQA maximum incremental cancer risk threshold of 10 in one million for toxic air contaminants.<sup>13</sup>

Upon further review of the DSEIR's Appendix C – Health Risk Assessment, it appears that the freeway truck traffic volume used for the HRA was from year 2020.<sup>14,15</sup> Emission factors, however, were from the EMFAC generated calendar model year 2026.<sup>16</sup> When compared to the 2020-year freeway truck traffic volume, the freeway truck traffic volume may be higher at project completion year in 2026. Numerous warehouses in the region not yet in operation are anticipated to be in operation by 2026 (for example future warehouses in the World Logistics Center business park in the eastern portion of the City of Moreno Valley).<sup>17</sup> Due to the growth of such activity in the region, an increase in truck traffic volume on the region's freeways is expected. This increase in truck traffic in the Proposed Project's full buildout year of 2026 should be accounted for in the HRA. By using 2020 freeway truck traffic volume, the number of trucks may have been underestimated along with the Proposed Project's operation health risk impacts. Staff therefore recommends that the Lead Agency revise the HRA by using 2026 projected freeway truck traffic volume in conjunction with 2026 emission factors. This revision should be included in the Final SEIR.

#### *Health Risk Reduction Strategies*

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<sup>7</sup> CARB's *Air Quality and Land Use Handbook: A Community Health Perspective*. Accessed at: <http://www.arb.ca.gov/ch/handbook.pdf>.

<sup>8</sup> CARB's technical advisory. Accessed at: <https://www.arb.ca.gov/ch/landuse.htm>.

<sup>9</sup> CARB's *Air Quality and Land Use Handbook: A Community Health Perspective*, Table 1-2, page 6.

<sup>10</sup> *Ibid.*

<sup>11</sup> DSEIR Appendix C. Health Risk Assessment. Significance Criteria and Methodology. Page 15.

<sup>12</sup> DSEIR. 4.2 Air Quality. Page 4.2-38.

<sup>13</sup> South Coast AQMD's CEQA Air Quality Significance Thresholds. Accessed at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>

<sup>14</sup> DSEIR Appendix C. Health Risk Assessment. Significance Criteria and Methodology. Page 15.

<sup>15</sup> Caltrans, Traffic Census Program – Traffic Volumes, April 2022. Accessed at: <https://dot.ca.gov/programs/traffic-operations/census>

<sup>16</sup> DSEIR Appendix C. Health Risk Assessment. Significance Criteria and Methodology. Page 15 through 16.

<sup>17</sup> Final Programmatic Environmental Impact Report for The World Logistics Center, May 2015. Accessed at: <https://moval.gov/cdd/pdfs/projects/wlc/FEIR.pdf>

Many strategies are available to reduce exposures, including, but not limited to, building filtration systems with MERV 13 or better, or in some cases, MERV 15 or better is recommended; building design, orientation, location; vegetation barriers or landscaping screening, etc. Enhanced filtration units are capable of reducing exposures. However, enhanced filtration systems have limitations. For example, in a study that South Coast AQMD conducted to investigate filters,<sup>18</sup> a cost burden is expected to be within the range of \$120 to \$240 per year to replace each filter panel. The initial start-up cost could substantially increase if an HVAC system needs to be installed and if standalone filter units are required. Installation costs may vary and include costs for conducting site assessments and obtaining permits and approvals before filters can be installed. Other costs may include filter life monitoring, annual maintenance, and training for conducting maintenance and reporting. In addition, because the filters would not have any effectiveness unless the HVAC system is running, there may be increased energy consumption. It is typically assumed that the filters operate 100 percent of the time while residents are indoors, and the environmental analysis does not generally account for the times when the residents have their windows or doors open or are in common space areas of the project. These filters have no ability to filter out any toxic gases. Furthermore, when used filters are replaced, replacement has the potential to result in emissions from the transportation of used filters at disposal sites and generate solid waste. Therefore, the presumed effectiveness and feasibility of any filtration units should be carefully evaluated in more detail prior to assuming that they will sufficiently alleviate exposures to diesel particulate matter emissions.

#### Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), South Coast AQMD staff requests that the Lead Agency provide South Coast AQMD staff with written responses to all comments contained herein prior to the certification of the Final SEIR. In addition, issues raised in the comments should be addressed in detail 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 will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and to 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 Evelyn Aguilar, Air Quality Specialist, at [eaguilar@aqmd.gov](mailto:eaguilar@aqmd.gov) should you have any questions.

Sincerely,

*Sam Wang*

Sam Wang

Program Supervisor, CEQA IGR

Planning, Rule Development & Implementation

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<sup>18</sup>This study evaluated filters rated MERV 13 or better. Accessed at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf>. Also see 2012 Peer Review Journal article by South Coast AQMD: <https://onlinelibrary.wiley.com/doi/10.1111/ina.12013>.