



**South Coast**  
**Air Quality Management District**  
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SENT VIA E-MAIL AND USPS:  
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Mr. Richard J. Sandzimier, Planning Official  
City of Moreno Valley  
14177 Frederick Street, P.O. Box 88005  
Moreno Valley, CA 92552-0805

**Draft Environmental Impact Report (DEIR) for the**  
**South Moreno Valley Walmart Project**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final CEQA document.

In the project description, the Lead Agency proposes the construction a 185,761 square foot retail store, gasoline station, and fast food restaurant on approximately 22 acres. In the Air Quality Section, the Lead Agency quantified the project's construction and operation air quality impacts and compared those impacts with the SCAQMD's recommended regional and localized daily significance thresholds. Based on its analyses, the Lead Agency has determined that construction air quality impacts will exceed the recommended regional daily threshold for NOx and the localized significance thresholds for PM<sub>10</sub> and PM<sub>2.5</sub>. Additionally, the operational daily NOx impacts exceed the recommended daily threshold. The Lead Agency will implement construction mitigation to reduce NOx, PM<sub>10</sub>, and PM<sub>2.5</sub> to non-significant levels, while daily operational limits are significant and unavoidable.

The SCAQMD staff has concerns regarding the air quality assumptions used in the CalEEMod land use model and the Health Risk Assessment. To address significant air quality impacts during construction, the Lead Agency should consider utilizing or adopting construction mitigation measures (e.g., by requiring the use of low-emitting construction equipment and trucks) that are consistent with measures adopted by other lead agencies<sup>1</sup>. An important component of the cited "Green Construction Policy" is the provision to use the lowest emitting equipment available, and if that is unavailable, using the next lowest emitting equipment. Please see the attachment for more information.

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<sup>1</sup> Los Angeles County Metropolitan Transportation Authority, July 21, 2011:  
<http://www.metro.net/about/search/?q=green%20construction%20policy>

Pursuant to Public Resources Code Section 21092.5, SCAQMD staff requests that the Lead Agency provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. Further, staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Jack Cheng, Air Quality Specialist, at (909) 396-2448, if you have any questions regarding the enclosed comments.

Sincerely,

*Jillian Wong*

Jillian Wong, Ph.D.  
Program Supervisor  
Planning, Rule Development & Area Sources

Attachment  
JW:JC  
RVC150421-05  
Control Number

## ATTACHMENT

### **Health Risk Assessment (HRA)**

1. The American Meteorological Society/Environmental Protection Agency Regulatory Model Improvement Committee (AERMIC) was formed to introduce state-of-the-art modeling concepts into the EPA's air quality models. Through AERMIC, a modeling system, AERMOD, was introduced that incorporated air dispersion based on planetary boundary layer turbulence structure and scaling concepts, including treatment of both surface and elevated sources, and both simple and complex terrain. As of December 9, 2006, AERMOD is fully promulgated as a replacement to ISC3, in accordance with [Appendix W \(http://www.epa.gov/ttn/scram/dispersion\\_prefrec.htm\)](http://www.epa.gov/ttn/scram/dispersion_prefrec.htm). AERMOD is a steady-state plume model that incorporates air dispersion based on planetary boundary layer turbulence structure and scaling concepts, including treatment of both surface and elevated sources, and both simple and complex terrain. AERMOD-ready meteorological data for various meteorological stations within the South Coast Air Basin (SCAB) are available for download free of charge at <http://www.aqmd.gov/home/library/air-quality-data-studies/meteorological-data/data-for-aermod>. The Lead Agency used AERMOD (version 13350) to prepare the dispersion modeling for the Health Risk Assessment (HRA), which is outdated. The current version is AERMOD (version 14134), which was available at the time of analysis. Therefore, SCAQMD staff recommends the Lead Agency revise the HRA with the current version of AERMOD.
2. In the modeling performed for the project, the Lead Agency use the non-default option of FLAT and FASTALL. According to SCAQMD's modeling guidance, the use of non-default options is not recommended without prior consultation with SCAQMD staff. SCAQMD staff recommends that the Lead Agency revise the dispersion modeling in the HRA using the default options including elevations.
3. The HRA analysis involved the use of separate discrete receptors placed randomly. SCAQMD staff recommends that the Lead Agency revise the HRA using a receptor grid of no more than 100-meter spacing over the existing residences and areas zoned or planned for residential development, in order to ensure that the maximum impacts to a residential receptor are properly analyzed.
4. Likewise, a similar receptor grid should be used for the worker receptors. The worker receptors grid should be at the property fence line as opposed to the building structure to ensure that the maximum impacts are properly analyzed.
5. Based on a review of the input files, the Lead Agency placed two receptors at the schools location. SCAQMD staff recommends that the Lead Agency revise the Health Risk Assessment (HRA) to include a receptor grid of no more than 100-meter spacing placed over the entire school property (includes classrooms, stadium, baseball fields, etc) in order to properly analyze and characterize the cancer risk impacts to the school.

6. In the HRA, the Lead Agency identified March Middle School as “school receptors” and used a nine-year exposure duration. However, worker receptors (teachers and administrative staff, etc.) were not identified in the HRA. Worker receptors placed on school property should therefore be identified and evaluated for a 40-year exposure period in the Final EIR.
7. In the HRA input modeling files, the Lead Agency used meteorological data from the Riverside station (SRA 23). In the HRA Report the Lead Agency states that meteorological data from the East San Gabriel Valley 1 station (SRA 9) was used. In the LST analysis, Perris Valley station (SRA 24) was used to determine construction and operational limits. SCAQMD staff recommends the Lead Agency update the dispersion modeling and HRA analysis using the Perris Valley station.

### **Additional Construction Mitigation Measures (NOx)**

8. Based on a review of the DEIR, the Lead Agency determined that with mitigation measures, the proposed project will not result in significant regional air quality impacts during construction. SCAQMD staff recommends the following additional mitigation measures be incorporated into the proposed project and FEIR to further reduce project impacts in addition to the measures included in the DEIR.

### **MM AQ-3**

- ~~During grading activity, all Rubber Tired Dozers and Scrapers shall be California Air Resources Board (CARB) Tier 3 Certified or better. All off-road diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.~~ Additionally, during grading activity, total horsepower hours per day for all equipment shall not exceed 16,784 horsepower-hours per day and the maximum disturbance (actively graded) area shall not exceed five acres per day.
- Alternatively, the Lead Agency could rely on the Green Construction Policy used by LA County Metro or the ports of Los Angeles/Long Beach. These policies include provisions to ‘step down’ from Tier 4 equipment to Tier 3 or Tier 2 if specified criteria are met.

### **Recommended Additions**

- Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export) and if the lead agency determines that 2010 model year or newer diesel trucks cannot be obtained, the lead agency shall use trucks that meet EPA 2007 model year NOx emissions requirements.
- A copy of each unit’s certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.

- Encourage construction contractors to apply for SCAQMD “SOON” funds. Incentives could be provided for those construction contractors who apply for SCAQMD “SOON” funds. The “SOON” program provides funds to accelerate cleanup of off-road diesel vehicles, such as heavy duty construction equipment. More information on this program can be found at the following website:

<http://www.aqmd.gov/home/programs/business/business-detail?title=vehicle-engine-upgrades>

For additional measures to reduce off-road construction equipment, refer to the mitigation measure tables located at the following website:

<http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>.

### **Recommended Mitigation Measures for Operational Air Quality Impacts (Mobile Sources)**

#### **Electric Vehicle (EV) Charging Stations**

- Vehicles that can operate at least partially on electricity have the ability to substantially reduce the significant NOx impacts from this project. It is important to make this electrical infrastructure available when the project is built so that it is ready when this technology becomes commercially available. The cost of installing electrical charging equipment onsite is significantly cheaper if completed when the project is built compared to retrofitting an existing building. Therefore, the SCAQMD staff recommends the Lead Agency require the proposed commercial center to be constructed with the appropriate infrastructure to facilitate sufficient electric charging for vehicles. Similar to the City of Los Angeles requirements for all new projects, the SCAQMD staff recommends that the Lead Agency require at least 5% of all vehicle parking spaces include EV charging stations.<sup>2</sup>

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<sup>2</sup> [http://ladbs.org/LADBSWeb/LADBS\\_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf](http://ladbs.org/LADBSWeb/LADBS_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf) , page 95.