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Revised Draft Program Environmental Impact Report (DPEIR) for the Proposed MoVal 2040: Moreno Valley General Plan Update, Associated Zoning Text Amendments to Title 9 (Planning and Zoning) and Zoning Atlas Amendments, and 2024 Climate Action Plan (CAP) (Proposed Project) (SCH No.: 2020039022)

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 (City) is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff has provided a brief summary of the project information and prepared the following comments, organized by topic of concern.

Summary of Project Information in the Revised DPEIR

Based on the Revised DPEIR, the Proposed Project consists of three separate planning documents: 1) the 2024 General Plan Update (GPU), which incorporates changes to the policy framework and land use designations of the existing 2006 General Plan (GP); 2) associated Zoning Text Amendments to Title 9 (Planning and Zoning) and Zoning Atlas Amendments; and 3) the 2024 Climate Action Plan (CAP) to establish a community-wide strategy for reducing greenhouse gas (GHG) emissions and adapting to the effects of climate change.[1]

The 2024 GPU primarily focuses on future development and redevelopment within proposed Concept Areas, which are: Downtown Center, Community Centers, Community Corridors, Highway Office/Commercial, Business Flex, and Residential Density Changes.[2] The 2024 includes a consolidated set of land use designations to introduce five new designations within the Concept Areas.[3] Other land use designations would be carried forward from the existing 2006 GP to the 2040 horizon year.[4]

The CAP would provide a comprehensive plan for addressing GHG emissions within the Proposed Project area.[5] The CAP was developed concurrently with the 2024 GPU to reinforce the City's

[1] Revised DPEIR. p. 3-4.
[2] *Ibid*. p. 3-8 to 3-12.
[3] *Ibid*. p. 3-13.
[4] *Ibid*.
[5] *Ibid*. p. 3-19.

commitment to reducing GHG emissions and to demonstrate how the City would comply with the State GHG emissions reduction standards under Senate Bill (SB) 32 and Assembly Bill (AB) 1279.[6]

The Proposed Project would result in approximately 33,812 new homes and approximately 45,012,371 square feet (sq. ft.) of non-residential uses by 2040, with 41,137,466 sq. ft. allocated for light industrial uses.[7]

South Coast AQMD Comments

Clarification on Whether the World Logistic Center is Accounted in the Proposed Project's Total Square Footage

According to the Revised DPEIR, Table 3-3 indicates that non-residential development is projected to increase from 33,746,988 sq. ft. under existing 2024 conditions to 74,884,455 sq. ft. in the future year 2040 scenario. This reflects a net increase of approximately 41,137,466 sq. ft. attributable to the Proposed Project.[8] However, it is unclear whether this total value includes the World Logistics Center (WLC), which is proposed to consist of up to 40.6 million sq. ft. of logistics, manufacturing, and associated industrial uses.[9] The Revised DPEIR does not explain whether the WLC is included within the total non-residential square footage projected through 2040. While the technical files provided by the Lead Agency indicate that emissions associated with the WLC have been quantified, the Revised DPEIR and its appendices do not clearly explain that the WLC is an integral component of the Proposed Project. Given the potential for substantial air quality impacts associated with large-scale logistics operations, the Lead Agency is recommended to clearly delineate whether the WLC is part of the Proposed Project's development assumptions. This clarification should be included in the Revised Final PEIR to ensure accurate emissions forecasting and a comprehensive evaluation of cumulative air quality impacts.

Inconsistent on Meteorological Data Used in AERMOD Modeling

According to Appendix H of the Revised DPEIR, the Health Effects and Health Risk Assessment indicates that the most recent five years of meteorological (MET) data from the South Coast AQMD's Perris Valley station were used in the AERMOD dispersion modeling.[10] However, a review of the AERMOD input files provided by the Lead Agency indicates that the MET data from the Riverside Municipal Airport (KRAL) station was actually utilized for the analyses.

To ensure consistency, accuracy, and transparency in the air quality and health risk assessment (HRA), the Lead Agency is recommended to clearly identify the MET dataset used in the modeling, revise the analyses as necessary to reflect the appropriate dataset, and incorporate the updated modeling results in the Revised Final PEIR. Accurate representation of meteorological data is critical for reliable dispersion modeling and subsequent evaluation of health risk and air quality impacts under CEQA.

[6] *Ibid*. p. 3-20.
[7] *Ibid*. p. 3-23.
[8] *Ibid*.
[9] *Ibid*. p. 2-7.
[10] Appendix H – Health Effects and Health Risk Assessment. p. 21.

Truck Idling Duration and Emissions Modeling

Appendix H indicates that a default assumption of 15 minutes of idling per truck per day was applied in the estimate of diesel particulate matter (DPM) emissions for the operational HRA.[11] This assumption, however, may not accurately reflect the actual operating conditions of the Proposed Project's scale. Specifically, for a high-throughput logistics or distribution facility with over 41 million sq. ft. allocated to light industrial uses, it is reasonably foreseeable that individual trucks visiting the site may experience extended periods of idling due to on-site queuing, security checks, staging, loading, and unloading operations, particularly during peak hours or in constrained circulation areas.

Although the California Air Resources Board (CARB) limits diesel truck idling to five minutes as set forth in the Airborne Toxic Control Measure (ATCM), this regulation provides exemptions for trucks equipped with engines that meet the optional low-NOx idle emission standard, which is typically applicable to model year 2008 and newer trucks. These vehicles, often referred to as "clean idle" certified, are permitted to idle longer than five minutes when situated more than 100 feet from sensitive land uses such as homes and schools.[12] Furthermore, CARB's EMFAC2021 Volume III Technical Document (Table 4.4.2-5) indicates that heavy-duty trucks may idle for up to five hours at a single location under certain conditions.[13] As such, by applying a 15-minute idling duration, the actual on-site idling behavior and, consequently, DPM emissions, which are a key contributor to localized health risks, may have been substantially underestimated in the HRA.

Accurate characterization of idling activity is essential to fully assess a project's potential health risk impacts, particularly for nearby sensitive receptors. Therefore, to ensure the HRA provides a conservative and health-protective estimate of potential exposure, the Lead Agency is recommended to either: 1) revise the operational emissions modeling in the Revised Final PEIR to assume a minimum of 30 minutes of idling per truck per day, unless site-specific data or operational constraints justify a shorter duration; or 2) provide empirical evidence, such as facility-specific queuing and processing time studies, vehicle circulation modeling, or comparable industry data, to substantiate the 15-minute assumption as being representative of the anticipated operation activities of the Proposed Project.

Assessment of Emissions and Operational Hours for Emergency Standby Engines and Potentially Underestimated Operational Emissions

Appendix H notes that the precise number of emergency backup generators anticipated under the 2024 GPU is currently unknown at the programmatic level. As a result, the Revised DPEIR estimates generator usage based on default electricity demand assumptions per industrial square footage as provided by the California Emissions Estimator Model (CalEEMod).[14] Accordingly, Table 6 in Appendix H presents the projected number of generators expected to be installed, based on industrial development area assumptions illustrated in Figure 1.

[11] Appendix H. p. 18.
[12] CARB. Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling available at https://ww2.arb.ca.gov/our-work/programs/atcm-to-limit-vehicle-idling
[13] CARB. EMFAC2021 Volume III Technical Document. p. 161. Table 4.4.2-5 available at EMFAC2021 Volume III Technical Document
[14] Appendix H. p. 19.

Figure 1: Screenshot of Table 6 in Appendix H

Table 6: Backup Generators

Industrial Area	Backup Generators	
	2024	2040
Area 1 (South)	20	25
Area 2 (West)	12	16
Area 3 (North)	0	1
Area 4 (East)	4	5
Area 5 (East)	-	53

Based on Table 6 of Appendix H, the number of emergency backup generators is projected to increase from 36 units under existing 2024 conditions to 100 units for all five areas by the 2040 horizon year. Furthermore, according to the technical file provided by the Lead Agency (labeled "MoVals HRA Calc"), emissions associated with these generators are estimated based on an operational schedule of 50 hours per year per unit.[15] It is important to note that South Coast AQMD air permits for emergency standby engines typically allow up to 50 hours per year for maintenance and testing, with a maximum of 200 total operational hours per year (including emergency use). As a result, the analysis of operational emissions for these generators should calculate the future emissions based on the assumption of 200 hours of operation per year per unit. If fewer hours are assumed for any or all of the new emergency engines, South Coast AQMD staff would need to include a permit condition to limit operations of these emergency engines to the hours specified in the CEQA analysis. Therefore, the Lead Agency is recommended to revise the emissions calculations for the emergency engines to reflect the maximum allowable usage. These revisions should be incorporated into the analysis of operational emissions, and the level of significance should be re-examined and updated accordingly. The revised calculations and supporting evidence should be included in the Revised Final PEIR.

Recommended Revision to the Air Quality Mitigation Measures

The Revised DPEIR concludes that impacts to sensitive receptors would be significant and proposes mitigation measures (MMs) to reduce these impacts.[16]

Specifically, MM AQ-4 states, "…if two or more dust-generating construction projects occur within 1,000 meters of each other, which collectively disturb 15 acres or more…a localized significance threshold (LST) analysis shall be prepared." However, MM AQ-4 raises two key concerns. First, the mitigation measure may potentially exclude other individual projects that may not occur concurrently within a 1,000-meter radius but that still have the potential to generate substantial localized emissions affecting nearby sensitive receptors. Second, the mitigation measure appears to limit the requirement for an LST analysis to be conducted for the construction phase, without addressing localized impacts from operational emissions, including those associated with stationary sources such as emergency backup generators, which emit DPM and toxic air contaminants (TACs) of concern.

[15] Provided technical file labeled as MoVal HRA Calc.
[16] *Ibid*. p. 4.3-40.

Therefore, to ensure comprehensive protection of sensitive receptors, the Lead Agency is recommended to revise the language in MM AQ-4 to require LST analyses for both the construction and operational phases of all future projects that will occur as part of the 2024 GPU, regardless of the proximity to each other or timing of implementation. The revised language should be incorporated into the Revised Final PEIR to ensure consistency with best practices in air quality impact assessment and mitigation.

Additional Recommended Air Quality and Greenhouse Gas Mitigation Measures and Project Design Features for Consideration

CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse air quality impacts. To further reduce the Proposed Project's air quality impacts, South Coast AQMD recommends incorporating the following mitigation measures and project design considerations into the Revised Final PEIR.

Mitigation Measures to Reduce Operational Air Quality Impacts from Mobile Sources

1. Require zero-emission (ZE) or near-zero emission (NZE) on-road haul trucks, such as heavy-duty trucks with natural gas engines that meet the CARB's adopted optional NOx emissions standard at 0.02 grams per brake horsepower-hour (g/bhp-hr), if and when feasible.

   Note: Given CARB's clean truck rules and regulations aiming to accelerate the utilization and market penetration of ZE and NZE trucks, such as the Advanced Clean Trucks Rule and the Heavy-duty Low NOx Omnibus Regulation, ZE and NZE trucks will become increasingly more available for use.

2. Require a phase-in schedule to incentivize the use of cleaner operating trucks to reduce any significant adverse air quality impacts.

   Note: South Coast AQMD staff are available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency.

3. Limit the daily number of trucks allowed at the Proposed Project to levels analyzed in the Revised Final PEIR. If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the Proposed Project through CEQA prior to allowing this higher activity level.

4. Provide electric vehicle (EV) charging stations or, at a minimum, provide electrical infrastructure and electrical panels which are appropriately sized for the demand. Electrical hookups should be provided for truckers to plug in any onboard auxiliary equipment.

Mitigation Measures to Reduce Operational Air Quality Impacts from Other Area Sources

1. Maximize the use of solar energy by installing solar energy arrays and battery storage.

2. Use light-colored paving and roofing materials.

3. Utilize only Energy Star-rated heating, cooling, and lighting devices and appliances.

Design Considerations for Reducing Air Quality and Health Risk Impacts

1. Clearly mark truck routes with trailblazer signs so that trucks will not travel next to or near sensitive land uses (e.g., residences, schools, daycare centers, etc.).

2. Design the Proposed Project such that truck entrances and exits are not facing sensitive receptors, and trucks will not travel past sensitive land uses to enter or leave the Proposed Project site.

3. Design the Proposed Project such that any truck check-in point is inside the Proposed Project site to ensure no trucks are queuing outside.

4. Design the Proposed Project to ensure that truck traffic inside the Proposed Project site is as far away as feasible from sensitive receptors.

5. Restrict overnight truck parking in sensitive land uses by providing overnight truck parking inside the Proposed Project site.

Lastly, the South Coast AQMD also suggests that the Lead Agency conduct a review of the following references and incorporate additional mitigation measures as applicable to the Proposed Project in the Revised Final PEIR:

1. State of California – Department of Justice: Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act[17]

2. South Coast AQMD 2022 Air Quality Management Plan,[18] specifically:

   a) Appendix IV-A – South Coast AQMD's Stationary and Mobile Source Control Measures

   b) Appendix IV-B – CARB's Strategy for South Coast

   c) Appendix IV-C – SCAG's Regional Transportation Strategy and Control Measure

3. United States Environmental Protection Agency (U.S. EPA) Transportation, Air Quality, and Climate Change.[19]

[17] State of California – Department of Justice, Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act available at https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf
[18] South Coast AQMD, 2022 Air Quality Management Plan (AQMP) available at http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan
[19] United States Environmental Protection Agency (U.S. EPA) Transportation, Air Quality, and Climate Change available at https://www.epa.gov/transportation-air-pollution-and-climate-change

Compliance with South Coast AQMD Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program

Since the Proposed Project consists of the net increase of 41,137,466 sq. ft. by 2040 for light industrial uses, and once the warehouses are occupied, the Proposed Project's warehouse owners and operators will be required to comply with South Coast AQMD Rule 2305 – Warehouse Indirect Source Rule – WAIRE Program[20] and Rule 316 – Fees for Rule 2305.[21] Rule 2305 and Rule 316 aim to reduce regional and local emissions of NOx and particulate matter (PM), including DPM, so as to reduce adverse public health impacts on communities located near warehouses. Rule 2305 applies to owners and operators of warehouses greater than or equal to 100,000 square feet. Under Rule 2305, operators are subject to an annual WAIRE Points Compliance Obligation that is calculated based on the annual number of truck trips to the warehouse. WAIRE Points can be earned by implementing actions in a prescribed menu in Rule 2305, implementing a site-specific custom plan, or paying a mitigation fee. Warehouse owners are only required to submit limited information reports, but they can opt to earn WAIRE Points on behalf of their tenants if they so choose, because certain actions to reduce emissions may be better achieved at the warehouse development phase, for instance, the installation of solar and charging infrastructure. Rule 316 is a companion fee rule for Rule 2305 to allow South Coast AQMD to recover costs associated with Rule 2305 compliance activities. Therefore, the Lead Agency is recommended to review Rule 2305 to determine the potential WAIRE Points Compliance Obligation for future operators and explore whether additional project requirements, design features/enhancements, and CEQA mitigation measures can be identified and implemented at the Proposed Project that may help future warehouse operators meet their compliance obligation. For questions concerning Rule 2305 implementation and compliance, please call (909) 396-3140 or email waire-program@aqmd.gov. For implementation of guidance documents and compliance and reporting tools, please visit South Coast AQMD's WAIRE Program webpage.

Health Risk Reduction Strategies

Many strategies are available to reduce exposures, including, but not limited to, building filtration systems with Minimum Efficiency Reporting Value (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 the South Coast AQMD conducted to investigate filters,[22] the 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 that the Lead Agency should evaluate in the Revised Final PEIR. It is typically assumed that the filters operate 100 percent of the time while residents are indoors, and the

[20] South Coast AQMD. Rule 2305 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xxiii/r2305.pdf
[21] South Coast AQMD. Rule 316 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-iii/r316.pdf
[22] This study evaluated filters rated MERV 13 or better. Accessed at: http://www.aqmd.gov/docs/defaultsource/ceqa/handbook/aqmdpilotstudyfinalreport.pdf. Also see 2012 Peer Review Journal article by South Coast AQMD: https://onlinelibrary.wiley.com/doi/10.1111/ina.12013.

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 to disposal sites and generate solid waste that the Lead Agency should evaluate in the Final Revised PEIR. 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.

South Coast AQMD Air Permits and Role as a Responsible Agency

Implementation of the Proposed Project would require the use of new stationary and portable sources, for which air permits from the South Coast AQMD will be required. The Revised Final PEIR should include a discussion about the South Coast AQMD rules that may be applicable to the Proposed Project. Those rules may include, for example, Rule 201 – Permit to Construct,[23] Rule 203 – Permit to Operate,[24] Rule 401 – Visible Emissions,[25] Rule 402 – Nuisance,[26] Rule 403 – Fugitive Dust,[27] Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,[28] Rule 1113 – Architectural Coatings,[29] Regulation XIII – New Source Review,[30] Rule 1401 – New Source Review of Toxic Air Contaminants,[31] Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines,[32] etc.

In addition, it is important to note that since air permits from the South Coast AQMD are required, South Coast AQMD's role under CEQA may be as a Responsible Agency. CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of the process for conducting a review of the Proposed Project and issuing discretionary approvals. Also, as set forth in CEQA Guidelines Section 15096(h), the Responsible Agency is required to make Findings in accordance with CEQA Guidelines Section 15091 for each significant effect of the project and issue a Statement of Overriding Considerations in accordance with CEQA Guidelines Section 15093, if necessary. Lastly, as set forth CEQA Guidelines Section 15096(i), the Responsible Agency may file a Notice of Determination.

CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of the process for conducting a review of the Proposed Project and issuing discretionary approvals. Moreover, it is important to note that if a Responsible Agency determines that a CEQA document is not adequate to rely upon for its discretionary approvals, the Responsible Agency must take further actions listed in CEQA Guideline Section 15096(e), which could have the effect of delaying the

[23] South Coast AQMD. Rule 201 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf
[24] South Coast AQMD. Rule 203 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf
[25] South Coast AQMD. Rule 401 available at https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf
[26] South Coast AQMD. Rule 402 available at https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf
[27] South Coast AQMD. Rule 403 available at https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403
[28] South Coast AQMD. Rule 1110.2 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf
[29] South Coast AQMD. Rule 1113 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf
[30] South Coast AQMD. Regulation XIII available at: https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiii
[31] South Coast AQMD. Rule 1401 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf
[32] South Coast AQMD. Rule 1470 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf

implementation of the Proposed Project. In its role as CEQA Responsible Agency, the South Coast AQMD is obligated to ensure that the CEQA document prepared for this Proposed Project contains a sufficient project description and analysis to be relied upon in order to issue any discretionary approvals that may be needed for air permits.

For these reasons, the final CEQA document should be revised to include a discussion about any and all new stationary and portable equipment requiring South Coast AQMD air permits, provide the evaluation of their air quality and greenhouse gas impacts, and identify South Coast AQMD as a Responsible Agency for the Proposed Project as this information will be relied upon as the basis for the permit conditions and emission limits for the air permit(s). Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions regarding what types of equipment would require air permits. For more general information on permits, please visit South Coast AQMD's webpage at https://www.aqmd.gov/home/permits.

Conclusion

As set forth in Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a-b), the Lead Agency shall evaluate comments from public agencies on the environmental issues and prepare a written response at least 10 days prior to certifying the Revised Final PEIR. As such, please provide South Coast AQMD written responses to all comments contained herein at least 10 days prior to the certification of the Revised Final PEIR. In addition, as provided by CEQA Guidelines Section 15088(c), if the Lead Agency's position is at variance with recommendations provided in this comment letter, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided.

Thank you for the opportunity to provide comments. South Coast AQMD staff are 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

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