

SENT VIA E-MAIL:

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**Draft Environmental Impact Report (EIR) for the Moreno Valley Business  
Park Building 5 Project (Proposed Project)  
(SCH No: 2023080366)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to review the above-mentioned document. The City of Moreno Valley is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff have provided a brief summary of the project information and prepared the following comments which are organized by topic of concern.

Summary of Proposed Project Information in the Draft EIR

Based on the Appendix D, AQIA, the Proposed Project consists of a single 220,390 square feet (sf) industrial building (Building 5) which will be evaluated assuming 154,270 sf of warehousing use (70% of the overall sf), 33,060 sf of manufacturing use (15% of the overall sf), and 33,060 sf of high-cube cold storage warehouse use (15% of the overall sf) for a total of 220,390 sf of industrial uses.<sup>1</sup> Based on a review of aerial photographs, South Coast AQMD staff found that the nearest sensitive receptor (e.g., residential development) is located 103 feet west of the project site.<sup>2</sup> Construction of the Proposed Project was originally anticipated to occur in August 2022 and will last through July 2023. The Proposed Project is located near the southeast corner of Ironwood Avenue at Heacock Street in Moreno Valley.<sup>3</sup>

South Coast AQMD Comments

The following comments were crafted based on what was solely provided in the Draft EIR, which did not include the technical data and modeling files relied upon for the air quality analysis, because the Lead Agency did not respond to staff's request dated February 19<sup>th</sup> 2025 seeking this additional information. As such, South Coast AQMD staff were unable to conduct a detailed review of the calculations, which hindered being able to fully evaluate the analysis of the air quality and greenhouse gas impacts.

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<sup>1</sup> Appendix D\_AQIA. Page 15.

<sup>2</sup> Draft EIR. Page 188.

<sup>3</sup> *Ibid.* Page 13.

*Request for Updated Air Quality Analysis and Land Use Types in the Draft EIR*

The air quality analysis in Appendix D of the Draft EIR (Appendix D\_AQIA) appears to rely on an outdated version of the California Emissions Estimator Model (CalEEMod) (CalEEMod 2020), even though a more recent, updated web-based version of CalEEMod<sup>4</sup> was available at the time the Notice of Preparation/Initial Study (NOP/IS) was released in August 2023. Thus, the air quality analysis does not appear to accurately reflect the current regulatory standards, emission factors, and air quality conditions and the reliance on outdated data raises concerns about the adequacy of the analysis and the potential that the project's air quality impacts were underestimated.

Additionally, based on Draft EIR, Table 4.3-4 (Preliminary Project Construction Schedule),<sup>5</sup> the construction schedule should be updated. While the document notes that if construction occurs after the dates presented, incremental and aggregate construction-source emissions would likely decrease due to the natural turnover of older vehicles and the adoption of more fuel-efficient equipment, it is still important to provide accurate construction dates. This will help ensure the analysis reflects the most precise and reliable results.

Additionally, the project description in the Draft EIR provides a general overview of the proposed light industrial uses of approximately 220,390 square feet. However, it lacks a detailed breakdown of these uses. Specifically, it does not specify the square footage allocated to different industrial activities, such as manufacturing, high-cube cold storage, and warehouse operations. In contrast, Appendix D, the AQIA, does provide this detailed breakdown, itemizing the square footage for each specific land use. This discrepancy creates a lack of clarity and consistency, hindering accurate emission estimations. To ensure clarity, consistency, accuracy of assumptions for emission estimations, and a comprehensive understanding of the project's scope, the Draft EIR should include the footprint size of these various land use types. This information is essential for determining the accurate trip generation rates and quantifying the associated air emissions. Without this level of detail, the air quality impact analysis provided in the Draft EIR may not accurately reflect the proposed project's actual operational characteristics. Therefore, the Lead Agency is recommended to:

1. Update the construction schedule to reflect the actual timeline and revise the project description in the Draft EIR to include a clear and detailed breakdown of the square footage allocated to each distinct industrial land use.
2. Update the air quality analysis and calculations to align with the proposed project's full scope and projected land use types by running the latest version of CalEEMod; and Provide South Coast AQMD with the technical data and modeling file.

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<sup>4</sup> CalEEMod Web-based version: <https://www.caleemod.com/>

<sup>5</sup> Draft EIR. Page 182.

*Localized Significance Threshold Analysis during Construction and Operation*

The localized significance threshold (LST) analysis in the Draft EIR appears to incorrectly rely upon the LST screening tables, which, as noted in table 3-2 of the LST methodology,<sup>6</sup> are not appropriate for determining the level of significance for projects sized larger than five acres. Since the Proposed Project covers approximately 9.98 acres, the Lead Agency is recommended to perform project-specific dispersion modeling to determine operational localized air quality impacts for the Proposed Project and include the results in the Final EIR.

*Mobile Source Emissions: Inconsistencies in Truck Trip Lengths and Vehicle Miles Traveled (VMT)*

In Appendix D of the Draft EIR, the AQIA quantifies the projected truck emissions by assuming a one-way truck trip length of 40 miles and that the truck trips are 100% primary trips. However, the Proposed Project site is located approximately 80 miles from the Ports of Long Beach and Port of Los Angeles which means that the air quality analysis substantially underestimated the emissions from trucks traveling between the Ports and the Proposed Project site. Therefore, the Lead Agency is recommended to revise the calculations by taking a project-specific approach to the vehicle trip length and trip rates by applying more realistic trip lengths, such as 80 miles one-way for Port-related trips. Tailoring these parameters and assumptions to project-specific data will ensure a more accurate assessment of emissions, accounting for the unique circumstances and logistical realities of the Proposed Project.

*South Coast AQMD Air Permits and Role as a Responsible Agency*

If implementation of the Proposed Project would require the use of new stationary and portable sources, including but not limited to emergency generators, fire water pumps, boilers, etc., air permits from South Coast AQMD will be required. As such, the revised CEQA document should include a discussion about the South Coast AQMD rules that may potentially apply to the Proposed Project. Those rules may include, for example, Rule 201 – Permit to Construct,<sup>7</sup> Rule 203 – Permit to Operate,<sup>8</sup> Rule 401 – Visible Emissions,<sup>9</sup> Rule 402 – Nuisance,<sup>10</sup> Rule 403 – Fugitive Dust,<sup>11</sup> Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,<sup>12</sup> Rule 1113 – Architectural Coating,<sup>13</sup> Rule 1166 – VOC Contaminated Soil Excavation,<sup>14</sup> Regulation XIII – New Source Review,<sup>15</sup> Rule 1401 – Air Toxics,<sup>16</sup> Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants,<sup>17</sup> Rule 1470 – Requirements for Stationary Diesel Fueled Internal

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<sup>6</sup> South Coast AQMD Final Localized Significance Threshold Methodology available at <https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf>. Page 28.

<sup>7</sup> South Coast AQMD. Rule 201 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>

<sup>8</sup> South Coast AQMD. Rule 203 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>

<sup>9</sup> South Coast AQMD. Rule 401 available at <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf>

<sup>10</sup> South Coast AQMD. Rule 402 available at <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>

<sup>11</sup> South Coast AQMD. Rule 403 available at <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403>

<sup>12</sup> South Coast AQMD. Rule 1110.2 available at [https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110\\_2.pdf](https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf)

<sup>13</sup> South Coast AQMD. Rule 1113 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf>

<sup>14</sup> South Coast AQMD. Rule 1166 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>

<sup>15</sup> South Coast AQMD. Regulation XIII available at <https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiii>

<sup>16</sup> South Coast AQMD. Rule 1401 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf>

<sup>17</sup> South Coast AQMD. Rule 1466 available <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf>

Combustion and Other Compression Ignition Engines,<sup>18</sup> etc. It is important to note that when air permits from South Coast AQMD are required, the role of South Coast AQMD changes from a Commenting Agency to a Responsible Agency under CEQA. In addition, if South Coast AQMD is identified as a Responsible Agency, per CEQA Guidelines Sections 15086, the Lead Agency is required to consult with South Coast AQMD.

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 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. South Coast AQMD is concerned that the project description and analysis in its current form in the MND is inadequate to be relied upon for this purpose.

For these reasons, the Final EIR should 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 California 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 Final EIR. As such, please provide South Coast AQMD written responses to all comments contained herein at least 10 days prior to the certification of the Final EIR. 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.

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<sup>18</sup> South Coast AQMD. Rule 1470 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf>

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 Sahar Ghadimi, Air Quality Specialist, at [sghadimi@aqmd.gov](mailto:sghadimi@aqmd.gov) or myself at [swang1@aqmd.gov](mailto:swang1@aqmd.gov) should you have any questions.

Sincerely,

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