



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

April 8, 2013

John Terell
Planning Official
City of Moreno Valley
14177 Frederick St.
Moreno Valley, CA, 92553

Subject: Proposed World Logistics Center Project, Draft Environmental Impact Report

Dear Mr. Terell:

The U.S. Environmental Protection Agency (EPA) became aware of the proposed World Logistics Center project in the City of Moreno Valley after being contacted by a resident concerned with potential air quality impacts from the project. Although EPA generally limits our review to Environmental Impact Statements required to comply with the National Environmental Policy Act, we do periodically review Environmental Impact Reports (EIR) if the potential impacts are substantial. Based on the concerns that were brought to our attention, EPA conducted a limited review of the World Logistics Center Project Draft EIR, dated February 4, 2013. Our review focused on potential air quality and health-related impacts.

The Draft EIR acknowledges that the proposed project is in an area that currently does not meet EPA's National Ambient Air Quality Standards and is classified as extreme nonattainment for 8-hour ozone, serious nonattainment for PM₁₀, and nonattainment for PM_{2.5}. For this reason, it is critical to identify and commit to all available mitigation measures to reduce air quality impacts as much as possible. The Draft EIR states that emissions from the construction and operation of the proposed project, even with the proposed mitigation measures, would lead to significant and unavoidable air quality impacts and would expose sensitive receptors to substantial pollutant concentrations (pages 1-2, Appendix A). The document further states that the project would exceed South Coast Air Quality Management District regional significance thresholds for volatile organic compounds, nitrogen oxides, carbon monoxide, PM₁₀, and PM_{2.5}.

To avoid or minimize the air quality impacts from the proposed project, we encourage the City to consider using the most robust mitigation measures available. Section 4.3 of the Draft EIR lists mitigation measures for the construction and operation of the proposed project. In addition to these measures, we suggest that the City consider implementing the mitigation measures listed below.

- Limit idling of heavy equipment and trucks to less than 5 minutes and verify compliance through unscheduled inspections. Information about the California Air Resources Board (CARB) mobile source anti-idling requirements is available at: <http://www.arb.ca.gov/insprog/truck-idling/truck-idling.htm>.
- Limit the use of the facility to zero/near-zero emission trucks meeting, at a minimum EPA's Tier 4 2010 emissions standards.

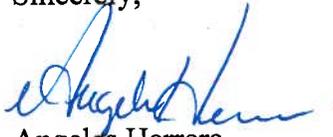
- Larger Tier 4 construction equipment will be more widely available in 2015.¹ If practicable, starting in 2015, limit construction equipment to EPA's Tier 4 emission standards.
- Commit to the use of construction equipment powered by alternative fuels (i.e., biodiesel, compressed natural gas, and electricity).

Furthermore, we suggest that the City review and consider the mitigation measures included in the Mitigation Monitoring and Reporting Program discussed in the Consent Judgment for *Center for Community Action and Environmental Justice et al. v. County of Riverside et al.*, February 14, 2013.² Specifically, we recommend that the City consider restricting truck routes from accessing roads next to residential areas; enforcing the California Air Resources Board's anti-idling regulation; establishing a diesel minimization plan; and utilizing its best efforts to analyze whether this project, and future projects subject to the California Environmental Quality Act, may impact certain overburdened communities and sensitive populations.

Lastly, we recommend that Section 4.3 of the Draft EIR be updated to describe the communities that would be impacted by air emissions from the proposed project. We encourage the City to evaluate any relevant and available demographic, socioeconomic, health, and environmental data to assess whether potential environmental justice concerns exist. We suggest that the City analyze and disclose the potential for certain subpopulations and overburdened communities to be more adversely affected by air pollution, and identify specific mitigation measures to address impacts to these populations. The additional analysis may identify a need to further lessen, mitigate, or avoid completely potential emissions from the World Logistics Center. Further, such an analysis may lead to specific design changes aimed at maintaining or improving the health of affected residents.

Please contact me, at (415) 972-3144, or Jacquelyn Hayes, of my staff, at (415) 972-3259 or hayes.jacquelyn@epa.gov, if EPA can be of assistance in this matter.

Sincerely,



Angeles Herrera
Associate Director
Communities and Ecosystems Division

cc: Ian MacMillan, SCAQMD
Arsenio Mataka, Cal/EPA
Hasan Ikhata, SCAG

¹ More information is available at <http://www.dieselnet.com/standards/us/nonroad.php>.

² A copy of the consent judgment is available at http://oag.ca.gov/sites/all/files/agweb/pdfs/environment/mira_loma_settlement.pdf.