



# South Coast Air Quality Management District

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March 17, 2015

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**Draft Initial Study/Negative Declaration (DND) for the Proposed 76-Unit  
Condominium Project (PA14-0032 Revised Tentative Tract Map 34544 and  
PA14-0033 Conditional Use Permit for a Planned Unit Development)**

The South Coast Air Quality Management District (SCAQMD) staff 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.

### Project Description

In the project description, the lead agency proposes to construct 76 detached residential condominium units including 22,800 feet of open space on a vacant, approximately 9.4 acre site. The project description is incomplete. The DND does not discuss if there are any applicable site preparation activities, e.g., grading, cut and fill, soil import/export needed and related activities (number(s) of daily haul trucks, distances to fill import and/or disposal locations, truck route(s), etc. The start of construction and completion dates for the different phases of construction, whether any of the phases overlap, etc., are also not included in the DND. This information should be included in the Final ND.

### Regional and Localized Air Quality Analyses

In the air quality section on Page Four, the Lead Agency determined that project construction and operational air quality impacts were less than significant by relying on the screening tables in Chapter 6 of the SCAQMD's 1993 CEQA Air Quality Handbook but did not quantify the proposed project's air quality impacts. Since these tables do not account for soil disturbance activities including any excavation, localized impacts to surrounding sensitive receptors and use now outdated mobile source emission factors, relying solely on these tables does not demonstrate that short- and long-term air quality impacts are below significance threshold levels. Rather, the SCAQMD staff recommends that project impacts be quantified and compared with recognized significance thresholds in the Final ND in order to demonstrate the lead agency's determination that project impacts are less than significant.

For estimating regional and localized project impacts, the current California Emission Estimator Model (CalEEMod)<sup>1</sup> land use emissions model is available that can quantify potential project criteria pollutant and also greenhouse (GHG) emissions. Project emissions can also be estimated by following the calculation methodologies in Chapter 9 and the Appendix to Chapter 9 in the South Coast SCAQMD's CEQA Air Quality Handbook.<sup>2</sup> Should the lead agency conclude after its analyses that construction or operational air quality impacts exceed the SCAQMD daily significance thresholds, staff has compiled mitigation measures<sup>3</sup> in addition to the mitigation included in the DND starting on Page Two of the DND to be implemented if the air quality impacts are determined to be significant.

Localized air quality impacts should also be evaluated since sensitive receptors (residences) are located within a quarter mile of the project site, north, east and west of the project site and would potentially be adversely impacted by the construction activities occurring at the site. SCAQMD guidance for performing a localized air quality analysis can also be found at the SCAQMD website.<sup>4</sup>

#### SCAQMD Rules and Regulations

Since the project site might have included previous land uses that may have impacted soils in the ground, the Lead Agency should cite SCAQMD Rule 1166 – Volatile Organic Compound Emissions From Decontamination of Soil if equipment will disturb the soils that contain hydrocarbon. In addition, the Final ND should discuss Rule 402 – Nuisance from potential odors that could potentially come from the bio-pit located on the south east portion of the project site. Further, the Final ND should discuss potential health risks to the proposed residents from the existing above-ground fuel storage tanks (fuel not specified) located south of the property at a county maintenance facility and fueling equipment, if applicable, at the convenience store located northwest across from Perris Boulevard since toxic air contaminants may be emitted from the on-going fueling operations. Finally, any potential air quality impacts from the existing industrial uses within close proximity that could impact future residents should also be discussed in the Final CEQA document.

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final ND. The SCAQMD staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

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<sup>1</sup> <http://www.aqmd.gov/home/regulations/ceqa/air-quality-modeling>

<sup>2</sup> <http://www.aqmd.gov/ceqa/hdbk.html>

<sup>3</sup> <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>

<sup>4</sup> <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>

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3

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Sincerely,

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