



# South Coast Air Quality Management District

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SENT VIA E-MAIL:

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## **Draft Environmental Impact Report (Draft EIR) for the Plot Plan No. 220002 (PPT 220002) Project (Proposed Project)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The Riverside County is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. The following comments include recommended revisions to the health risk impacts during operation, and information about South Coast AQMD air permits that the Lead Agency should include in the Revised Draft EIR or the Final EIR.

### **South Coast AQMD Staff's Summary of Project Information in the Draft EIR**

Based on the Draft EIR, the Lead Agency proposes construction of a 434,823 square foot warehouse on 20.57 acres.<sup>1</sup> The project scenario, with the largest quantity of emissions have been evaluated, assumes that 130,447 square footage (sf), 30 percent of the overall sf, will be used as high-cube cold storage warehouse. The remaining 304,376 sf would be developed as high-cube fulfillment center warehouse use.<sup>2</sup> The Proposed Project is located at the southwest corner of Harvill Avenue and Water Street in Mead Valley.<sup>3</sup> Based on a review of aerial photographs, South Coast AQMD staff found that the nearest sensitive receptor (a residential house) is located within 117 feet south of the Proposed Project site. The construction period is anticipated to last 17 months, which was expected to begin in January 2023 and end in May 2024.<sup>4</sup>

### **South Coast AQMD Staff's Comments on the Draft EIR**

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

South Coast AQMD staff found that there are more than ten single-family residences located near the southern and western boundaries of the Proposed Project site. However, only two of them are used as receptors in the HRA and provided in its associated dispersion modeling files. The other residential houses located in between the two receptors are not included as residential receptors in the HRA. Given the fact that the primary truck routes are in the western and southern area from the Proposed Project site, the highest ground level concentration of diesel particulate matters from the dispersion modeling results is expected to occur in this area. As a result, it appears that the receptors in the model are not dense enough to capture the maximum

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<sup>1</sup> Draft EIR, p. 13.

<sup>2</sup> Ibid. p. 13.

<sup>3</sup> Ibid p. 13.

<sup>4</sup> Appendix B\_ Air Quality Impact Analysis. p. 34.

pollutant concentrations to estimate the maximum cancer risk values. South Coast AQMD staff recommends that the Lead Agency revise the health risk assessment and dispersion modeling files by adding more residential receptors on the west and south side of facility.

In addition, based on the construction and operational HRA modeling files, the ANNUAL<sup>5</sup> keyword was used for pollutant averaging time in the control pathway in the AERMOD model. However, according to the South Coast AQMD Risk Assessment Procedures v8.1 and South Coast AQMD Modeling Guidance for AERMOD,<sup>6</sup> the detailed HRA utilizing AERMOD should be run using the averaging time PERIOD and 1-hour. Since the construction and operational HRAs of the Proposed Project using ANNUAL, South Coast AQMD staff recommend that the Lead Agency re-run the construction and operational HRAs utilizing PERIOD and 1-hour averaging time to determine the health risk impacts to the sensitive receptors and off-site workers and include the revised results in the Final EIR. If the revision is not included in the Final EIR, the Lead Agency should provide reasons for not having them supported by substantial evidence in the record.

Lastly, staff also found that the warehouse building is not included in the building downwash option in the AERMOD dispersion model during operation. The ground level pollutant concentrations near the building would be under-estimated if the downwash effects were absent in the dispersion modeling. Therefore, building downwash should be considered for the Proposed Project operation in order to predict more accurate ground-level concentrations.

#### *South Coast AQMD Air Permits and Responsible Agency Role*

If the construction or operation of the Proposed Project requires using the new stationary and portable sources, including but not limited to emergency generators, fire water pumps, boilers, spray booths, and etc., air permits from South Coast AQMD will be required. The Revised Draft EIR or Final EIR should include a discussion on stationary and portable equipment requiring South Coast AQMD permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project. Any assumptions used for the stationary and portable sources in the Revised Draft EIR or the Final EIR will also be used as the basis for the permit conditions and limits for the Proposed Project. Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions relative to air permits. General information on air permits is also available on South Coast AQMD's webpage at: <http://www.aqmd.gov/home/permits>.

#### Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), the Lead Agency is required to provide South Coast AQMD written responses to all comments contained herein at least 10 days prior to certifying the Revised Draft EIR or the Final EIR. In addition, as provided by CEQA Guidelines Section 15088(c), if the Lead Agency's position is at variance with the recommendations provided in this comment letter, detailed

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<sup>5</sup> South Coast AQMD Risk Assessment Procedures v8.1. Access at: <http://www.aqmd.gov/docs/default-source/permitting/rule-1401-risk-assessment/riskassessproc-v8-1.pdf>

<sup>6</sup> 11 South Coast AQMD Modeling Guidance for AERMOD. Access at: [South Coast AQMD Modeling Guidance for AERMOD](#)

reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided.

We appreciate the opportunity to review the Proposed Project. Thank you for considering these comments. South Coast AQMD staff is 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) should you have any questions.

Sincerely,

*Sam Wang*

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