



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 Proposed
West Campus Upper Plateau Project (Proposed Project)
(SCH Number: 2021110304)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The March Joint Power Authority is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. The following comments recommended revision to the health risk assessment, California Emissions Estimator Model (CalEEMod) analysis, greenhouse gas emissions analysis, additional air quality mitigation measures, and South Coast AQMD Permits and Responsible Agency the Lead Agency should include in the Final EIR.

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

Based on the Draft EIR, the Proposed Project consists of the Specific Plan Area and Conservative Easement that comprise approximately 818 acres within the March Joint Power Authority (JPA) planning area.¹ The project components of the Proposed Project consist of a) Specific Plan Area includes business park, industrial, mixed-use, public facility, parks, recreation and open space, and infrastructure improvements, totaling 369.60 acres;² b) Conservative Easement includes open space, which totals of 445.43 acres.³ There is an existing Eastern Municipal Water District Water Tank within the Proposed Project site comprises 2.87 acres.⁴

Under the Specific Plan Area component of the Proposed Project, the Draft EIR assumes the following buildout for the analysis⁵:

- Building B – 1,250,000 square feet of high-cube fulfillment center warehouse use
- Building C – 587,000 square feet of high-cube fulfillment center warehouse use
- Industrial Area – 725,561 square feet of high-cube fulfillment center warehouse use
- Industrial Area – 500,000 square feet of high-cube cold storage warehouse use
- Business Park Area – 1,280,403 square feet of business park use (assume 75% warehouse use and 25% office and non-warehouse use⁶)

¹ Draft EIR. Page 3-1.

² *Ibid.* Page 1-4.

³ *Ibid.*

⁴ *Ibid.*

⁵ *Ibid.* Page 1-4 and 1-5.

⁶ *Ibid.* Page 3-9.

- Mixed Use Area – 160,921 square feet of retail use (25%)
- Mixed Use Area – 482,765 square feet of business park use (75%)
- 60.28-acre park (with Active and Passive uses)
- 17.72 acres of Open Space use
- Public Facility – 2.84 acres for future sewer lift station and electrical substation (within the Specific Plan Area)

Since the Proposed Project includes 500,000 square feet of cold storage warehouse, trucks associated with the cold storage warehouse are assumed to have transport refrigeration units (TRUs) and are estimated as 188 trucks (376 two-way truck trips per day).⁷ The Proposed Project Trip Generation would have a total of 2,504 trucks trip per day.⁸

The Proposed Project is in the western portion of the March JPA planning area, west of Cactus Avenue's current terminus, east and south of the Mission Grove neighborhood, and north of the Orangecrest neighborhood in the City of Riverside.⁹ Based on the aerial photographs, South Coast AQMD staff finds that the nearest sensitive receptors (e.g., residences) are adjacent to the north, south, and west of the Proposed Project boundaries. The Proposed Project's construction is estimated to begin in June 2023 and last approximately 4.5 years.¹⁰ The proposed Project would be fully occupied and operational in Fall 2027.¹¹

South Coast AQMD Staff's Comments on the Draft EIR

Health Risk Assessment (HRA) Analysis

Averaging Time Utilized in Construction and Operational HRA Analysis

Based on the construction and operational HRA output files, the averaging time for the analysis is ANNUAL.¹² However, according to the South Coast AQMD Risk Assessment Procedures v8.1, the detailed HRA utilizing AERMOD should be run using the averaging time PERIOD and 1-hour.¹³ 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.

Building Downwash Option in Operational HRA

Based on the South Coast AQMD staff review, the HRA modeling file does not include the building downwash option in the operational HRA. The ground-level pollutant concentrations near the building would be underestimated if the downwash effects were absent in the dispersion

⁷ *Ibid.* Page 4.2-24.

⁸ *Ibid.* Page 4.15-7.

⁹ *Ibid.* Page 3-1.

¹⁰ *Ibid.* Page 3-19.

¹¹ *Ibid.*

¹² *Ibid.* Appendix A – Mobile Source Health Risk Assessment. Pages 73 and 245 of PDF.

¹³ 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>

modeling. Therefore, building downwash should be considered for the Proposed Project operation in order to predict more accurate ground-level concentrations. In addition, the truck idling emissions would need to be estimated separately and included in the dispersion modeling analysis and HRA as point sources. However, the operational HRA modeling file indicates those emissions as line volume source types. Thus, truck idling emissions should be modeled as point sources with a building downwash option selected. In addition, it needs to be clarified in the Draft EIR if the stationary combustion engines (e.g., diesel firewater pump, diesel emergency generator, etc.) will be used on-site during operation. If any of these will be used when implementing the Proposed Project, they will need to be added as additional sources to the HRA and dispersion modeling files. Therefore, South Coast AQMD staff recommend that the Lead Agency revise the operational HRA modeling by incorporating the above recommendations and including the HRA results in the Final EIR. If the HRA modeling is not revised and included in the Final EIR, the Lead Agency should provide reasons supported by substantial evidence in the record to explain why the revision is not included.

California Emissions Estimator Model (CalEEMod) Analysis

The Lead Agency utilizes California Emissions Estimator Model (CalEEMod) version 2022.1 to calculate the Proposed project's emissions from construction and operational activities and includes the CalEEMod output files in Appendix C-1: Air Quality Technical Report.¹⁴ South Coast AQMD staff has the following concerns regarding the CalEEMod output files and recommends that the Lead Agency review and revise the CalEEMod analysis and include the revision in the Final EIR.

User-Defined Land Use Subtype and Truck Fleet Mix

In the operational CalEEMod output files, besides the “unrefrigerated warehouse-no rail” and “refrigerated warehouse-no rail” land use types, “user-defined industrial” is added.¹⁵ According to the CalEEMod User Guide, the “user-defined” may be selected to characterize project land use subtypes that are not included in CalEEMod. If selected, all data on the Land Use screen will need to be input manually.¹⁶ However, the size metric, lot acreage, and the floor square area use are all set to zero under the “user-defined industrial” land use subtype.

In addition, the truck fleet mix is input under the “user-defined industrial” but not in the “unrefrigerated warehouse-no rail” and “refrigerated warehouse-no rail” land use. This possibly leads to underestimating the heavy-duty truck emissions for warehouse activities since no data is filled under this “user-defined industrial” land use subtype.

Therefore, South Coast AQMD staff recommends that the Lead Agency explain why the land use is separated in the CalEEMod analysis; why the fleet mix is not under the “unrefrigerated warehouse-no rail” and “refrigerated warehouse-no rail” land use and include the explanation in the Final EIR. If the explanation is not included in the Final EIR, the Lead Agency should provide reasons for not having them supported by substantial evidence in the record.

¹⁴ *Ibid.* Appendix C-1: Air Quality Technical Report.

¹⁵ *Ibid.* Appendix C-1: Air Quality Technical Report. Page 223 of PDF.

¹⁶ California Emissions Estimator Model (CalEEMod) Version 2022.1 User Guide. Access at: https://www.caleemod.com/documents/user-guide/CalEEMod_User_Guide_v2022.1.pdf

Trip Generations

Appendix N – Transportation of the Draft EIR discusses the Proposed Project trip generation and includes the summary in Table 4-2 of the Project Total Trips of 35,314 daily, in which 2,054 trucks trips per day.¹⁷ Although the Project Total Trips from Appendix N match with Appendix C-1 CalEEMod output files,¹⁸ the trip numbers under each land use type are different from Appendix N, an example is shown in Table A to demonstrate the difference.

Table A
Example of the Difference in Trip Numbers between Appendix N and Appendix C-1

Land Use Type	Appendix N – Transportation	Appendix C-1: Air Quality Technical Report – CalEEMod Output Files
Refrigerated Warehouse-No Rail	1,062 trips/weekday	669 trips/weekday

Due to the differences, South Coast AQMD staff recommends that the Lead Agency explain the differences and/or revise Appendix N and Appendix C-1 to present consistent values to avoid discrepancies throughout the documents and include the revision in the Final EIR. If the revision is not included in the Final EIR, the Lead Agency should provide reasons supported by substantial evidence in the record to explain why the revision is not included.

Greenhouse Gas Emissions Analysis

Based on the Draft EIR, the Proposed Project's greenhouse gas (GHG) emissions are calculated using CalEEMod latest version (v2022.1).¹⁹ The amortized annual construction emissions and Proposed Project GHG emissions prior to mitigations are shown in Tables 4.7-6 and 4.7-7.²⁰ To reduce GHG emissions, the Lead Agency proposes MM-GHG-1 to MM-GHG-11²¹ and concludes that the Proposed Project's GHG emissions would be less than significant with mitigation incorporated.²² Table 4.7-8 shows the mitigated Proposed Project's total CO₂e emissions of 91,010.58 metric tons per year (MT/yr CO₂e).²³ However, South Coast AQMD staff has concerns about the conclusion of "*less than significant with mitigation incorporated*" since the Proposed Project's total GHG emissions with mitigation are greater than the GHG CEQA significance thresholds of 10,000 MT/yr CO₂e.²⁴ Thus, South Coast AQMD staff recommends that the Lead Agency provide an explanation of how the "*less than significant with mitigation incorporated*" conclusion is determined in the Final EIR. In the event that the "*less than significant with mitigation incorporated*" conclusion is incorrect, it's recommended that the Lead Agency revise the GHG emissions section with the correct determination and include the revision in the Final EIR. If the revision is not included in the Final EIR, the Lead Agency should provide reasons supported by substantial evidence in the record to explain why the revision is not included.

¹⁷ *Ibid.* Page 63.

¹⁸ *Ibid.* Appendix C-1: Air Quality Technical Report. Page 267 of PDF.

¹⁹ *Ibid.* Page 4.7-28.

²⁰ *Ibid.* Page 4.7-40.

²¹ *Ibid.* Page 4.7-41 to 4.7-42.

²² *Ibid.* Page 4.7-42.

²³ *Ibid.*

²⁴ South Coast AQMD CEQA Significance Thresholds. Access at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>

Additionally, the Draft EIR discusses the cumulative effects conclusion under the GHG section and indicates the result as “*less than cumulatively considerable.*”²⁵ As mentioned in the above comment, the GHG emissions would be significant and unavoidable after incorporated mitigation due to the exceedance in the CEQA significance thresholds of 10,000 MTCO₂e/year; thus, the conclusion for the cumulative effects should be addressed as cumulatively considerable and not as less than cumulative considerable. Therefore, South Coast AQMD staff recommends that the Lead Agency revise the cumulative effects discussion under the GHG section and include the revision in the Final EIR. If the revision is not included in the Final EIR, the Lead Agency should provide reasons supported by substantial evidence in the record to explain why the revision is not included.

Additional Air Quality and Greenhouse Gas Mitigation Measures

According to the Draft EIR, the maximum daily emissions from the Proposed Project are significant (VOC for construction²⁶ and VOC, NO_x, CO, and PM₁₀ for operation²⁷) prior to mitigations. To reduce the emissions from construction and operational activities, the Lead Agency proposes mitigation measures from MM AQ-1 to MM AQ-15²⁸ and project design features PDF-AQ-1 to PDF-AQ-11.²⁹ Similarly, the Lead Agency proposes MM-GHG-1 to MM-GHG-11³⁰ and PDF-GHG-1³¹ to reduce the Proposed Project’s GHG emissions in the Draft EIR.

The South Coast AQMD staff strongly encourages the Lead Agency to review the below references and consider including the additional recommended mitigation measures in the Final EIR.

- State of California – Department of Justice: Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act³²
- South Coast AQMD 2022 South Coast Air Quality Management Plan,³³ specifically:
 - Appendix IV-A – South Coast AQMD’s Stationary and Mobile Source Control Measures
 - Appendix IV-B – CARB’s Strategy for South Coast
 - Appendix IV-C – SCAG’s Regional Transportation Strategy and Control Measures
- United States Environmental Protection Agency (U.S. EPA): Mobile Source Pollution - Environmental Justice and Transportation³⁴

²⁵ *Ibid.* Page 4.7-43.

²⁶ *Ibid.* Page 4.2-27.

²⁷ *Ibid.* Page 4.2-28.

²⁸ *Ibid.* Page 4.2-25 to 4.2-38.

²⁹ *Ibid.* Page 4.2-15.

³⁰ *Ibid.* Page 4.7-41 to 4.7-42.

³¹ *Ibid.* Page 4.7-27.

³² State of California – Department of Justice. Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act. Access at: <https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf>

³³ 2022 South Coast AQMP. Access at: <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan>

³⁴ United States Environmental Protection Agency (U.S. EPA): Mobile Source Pollution - Environmental Justice and Transportation. Access at: <https://www.epa.gov/mobile-source-pollution/environmental-justice-and-transportation>

South Coast AQMD Permits and Responsible Agency

If the implementation of the Proposed Project would require the use of new stationary equipment, including but not limited to emergency generators, fire water pumps, boilers, etc., permits from South Coast AQMD are required. The Final EIR should include a discussion on stationary 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 sources in 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 on permits. For more general information on permits, please visit 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), South Coast AQMD staff requests that the Lead Agency provide South Coast AQMD staff with written responses to all comments contained herein, at least ten days prior to the certification of the Final EIR.³⁵ In addition, when the Lead Agency's position is at variance with recommendations raised in the comments, the issues raised in the comments should be addressed in detail, giving reasons why specific comments and suggestions are not accepted. There should be good faith and reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines §15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision-makers and to the public who are interested in the Proposed Project.

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 Danica Nguyen, Air Quality Specialist, at dnguyen1@aqmd.gov should you have any questions.

Sincerely,

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RVC230111-04

Control Number

³⁵ 2022 CEQA Statutes and Guidelines Section 21092.5(a): "At least 10 days prior to certifying an environmental impact report, the lead agency shall provide a written proposed response to a public agency on comments made by that agency which conform with the requirements of this division. Proposed responses shall conform with the legal standards established for responses to comments on draft environmental impact reports. Copies of responses or the environmental document in which they are contained, prepared in conformance with other requirements of this division and the guidelines adopted pursuant to Section 21083, may be used to meet the requirements imposed by this section."

Access at: https://www.califaep.org/docs/2022_CEQA_Statue_and_Guidelines.pdf.