



# South Coast Air Quality Management District

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SENT VIA E-MAIL:

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## **Draft Environmental Impact Report (EIR) for the Proposed CADO Menifee Industrial Warehouse Project (Proposed Project) (SCH No.: 2022040622)**

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

### South Coast AQMD Staff's Summary of Project Information in the DEIR

Based on the Draft EIR, the Proposed Project consists of demolishing two existing residential structures and developing an approximately 700,037 square feet (sq. ft) industrial warehouse building on a 40.03 gross-acre site.<sup>1</sup> The Proposed Project would contain 98 dock doors, with 49 dock doors on the southern and northern portions of the building.<sup>2</sup> The Proposed Project is located north of Corsia Lane, south of Kuffel Road, east of Wheat Street, and west of Byers Road in Menifee.<sup>3</sup> Based on the aerial photographs, South Coast AQMD staff found that the nearest sensitive receptor (e.g., residential) is within 100 ft north of the Proposed Project site. The Proposed Project's construction is anticipated to occur over approximately 14 months, beginning in 2024.<sup>4</sup>

### South Coast AQMD Staff's Comments on the DEIR

#### *Potential of Inappropriate Vehicle Fleet Mixes to Evaluate Proposed Project's Air Quality Impacts from Mobile Sources*

The Proposed Project's operational emissions from mobile sources may have been underestimated using inappropriate vehicle fleet mixes in the Draft EIR. According to Table 4.13-2: Summary of Project Trip Generation, the Proposed Project generates 135 daily truck trips, representing only 3% of the total daily trips.<sup>5</sup> South Coast AQMD staff believes that the number of trucks assumed

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<sup>1</sup> Draft EIR. Page 2-3.

<sup>2</sup> *Ibid.*

<sup>3</sup> *Ibid.* Page 2-1.

<sup>4</sup> *Ibid.* Page 2-4.

<sup>5</sup> *Ibid.* Page 4.13-16.

in the Draft EIR to serve the proposed industrial uses is too low for warehouse facilities, given that the total industrial use of the Proposed Project is approximately 700,037 sq. ft. For instance, the Fontana Truck Trip Generation Study indicates that 20.4% of the total daily vehicle trips from warehouses greater than 100,000 square feet consist of trucks.<sup>6</sup> This study is based on traffic counts from warehouses. Thus, it is recommended to re-evaluate the Proposed Project's air quality impacts, assuming a more conservative fleet mix supported by substantial evidence.

#### *California Emission Estimator Model (CalEEMod) Versions*

According to the Draft EIR and Appendix B1 - Air Quality Assessment, the Proposed Project's emissions calculations are analyzed using the CalEEMod version 2020.4.0.<sup>7</sup> At the time when the Draft EIR was prepared, the Lead Agency should consider using the latest CalEEMod 2022.1.1 version (first released in May 2022), instead of the previous version. Since the Proposed Project's Notice of Preparation was released on May 2, 2022, South Coast AQMD staff recommends that the Lead Agency quantifies the emissions calculations utilizing the latest CalEEMod version, determines the significant level, and includes the result in the Final EIR.

#### *Additional Recommended Air Quality and Greenhouse Gases Mitigation Measures and Project Design Considerations*

CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse air quality impacts. To further reduce the Proposed Project's air quality impacts, South Coast AQMD staff recommends incorporating the following mitigation measures and project design considerations into the Final EIR.

#### Mitigation Measures for Operational Air Quality Impacts from Mobile Sources

1. Require zero-emissions (ZE) or near-zero emission (NZE) on-road haul trucks, such as heavy-duty trucks with natural gas engines that meet the CARB's adopted optional NOx emissions standard at 0.02 grams per brake horsepower-hour (g/bhp-hr), if and when feasible.

Note: Given the state's clean truck rules and regulations aiming to accelerate the utilization and market penetration of ZE and NZE trucks, such as the Advanced Clean Trucks Rule and the Heavy-duty Low NOx Omnibus Regulation, ZE and NZE trucks will become increasingly more available to use.

2. Require a phase-in schedule to incentivize the use of cleaner operating trucks to reduce any significant adverse air quality impacts.

Note: South Coast AQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency.

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<sup>6</sup> City of Fontana. Truck Trip Generation Study. Available at: <https://tampabayfreight.com/pdfs/Freight%20Library/Fontana%20Truck%20Generation%20Study.pdf>

<sup>7</sup> Appendix B1 – Air Quality Assessment. CalEEMod Output Files.

3. At a minimum, require the use of a 2010 model year that meets CARB's 2010 engine emissions standards at 0.01 g/bhp-hr of particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks. All heavy-duty haul trucks should meet CARB's lowest optional low-NOx standard starting in 2022. Where appropriate, include environmental analyses to evaluate and identify sufficient electricity and supportive infrastructures in the Energy and Utilities and Service Systems Sections in the CEQA document. Include the requirements in applicable bid documents, purchase orders, and contracts. Operators shall maintain records of all trucks associated with project construction to document that each truck used meets these emission standards and make the records available for inspection. Regular inspections should be conducted by the Lead Agency to the maximum extent feasible to ensure compliance.
4. Limit the daily number of trucks allowed at the Proposed Project to levels analyzed in the Final CEQA document. If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the Proposed Project through CEQA prior to allowing this higher activity level.
5. Provide electric vehicle (EV) charging stations or, at a minimum, provide electrical infrastructure, and electrical panels should be appropriately sized. Electrical hookups should be provided for truckers to plug in any onboard auxiliary equipment.

#### Mitigation Measures for Operational Air Quality Impacts from Other Area Sources

1. Maximize the use of solar energy by installing solar energy arrays.
2. Use light-colored paving and roofing materials.
3. Utilize only Energy Star heating, cooling, and lighting devices and appliances.

#### Design Considerations for Reducing Air Quality and Health Risk Impacts

1. Clearly mark truck routes with trailblazer signs so that trucks will not travel next to or near sensitive land uses (e.g., residences, schools, daycare centers, etc.).
2. Design the Proposed Project such that truck entrances and exits are not facing sensitive receptors and trucks will not travel past sensitive land uses to enter or leave the Proposed Project site.
3. Design the Proposed Project such that any truck check-in point is inside the Proposed Project site to ensure no trucks are queuing outside.
4. Design the Proposed Project to ensure that truck traffic inside the Proposed Project site is as far away as feasible from sensitive receptors.
5. Restrict overnight truck parking in sensitive land uses by providing overnight truck parking inside the Proposed Project site.

Lastly, the South Coast AQMD also suggests that the Lead Agency conduct a review of the following references and incorporate additional mitigation measures as applicable to the Proposed Project in the Final EIR:

1. State of California – Department of Justice: Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act<sup>8</sup>
2. South Coast AQMD 2022 Air Quality Management Plan,<sup>9</sup> specifically:
  - a) Appendix IV-A – South Coast AQMD’s Stationary and Mobile Source Control Measures
  - b) Appendix IV-B – CARB’s Strategy for South Coast
  - c) Appendix IV-C – SCAG’s Regional Transportation Strategy and Control Measure
3. United States Environmental Protection Agency (U.S. EPA): Mobile Source Pollution - Environmental Justice and Transportation<sup>10</sup>

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

If the 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, etc., air permits from South Coast AQMD will be required, and the role of South Coast AQMD would change 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. In addition, 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 evaluating the applications for air permits. For these reasons, the Final EIR should include a discussion about any new stationary and portable equipment requiring South Coast AQMD air permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project.

The Final EIR should also include calculations and analyses for construction and operation emissions for the new stationary and portable sources, as this information will also 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: <http://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

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<sup>8</sup> State of California Department of Justice. Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act. Available at: <https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/warehouse-best-practices.pdf>

<sup>9</sup> South Coast AQMD, 2022 Air Quality Management Plan. Available at: <http://www.aqmd.gov/home/air-quality/air-quality-management-plans/air-quality-mgt-plan>

<sup>10</sup> US.EPA. Mobile Source Pollution - Environmental Justice and Transportation. Available at: <https://www.epa.gov/mobile-source-pollution/environmental-justice-and-transportation>

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.

Thank you for the opportunity to provide 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 Danica Nguyen, Air Quality Specialist, at [dnguyen1@aqmd.gov](mailto:dnguyen1@aqmd.gov) should you have any questions.

Sincerely,

*Sam Wang*

Sam Wang

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Planning, Rule Development & Implementation

SW:DN

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