



South Coast Air Quality Management District

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Draft Supplemental Environmental Impact Report (SEIR) for the Walnut Business Park Project (Proposed Project) (SCH No: 2017101010)

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

Summary of Proposed Project Information in the Draft SEIR

Based on the Draft SEIR, the Proposed Project consists of demolishing 357,544 square feet of existing buildings and constructing four concrete tilt-up buildings that would encompass a total of 414,778 square feet, distributed as 392,488 square feet of light industrial and warehousing space and 22,290 square feet of office/retail space on 23 acres. Approximately 53,549 square feet of these buildings would be refrigerated areas. The Proposed Project would also include a total landscaped area of 115,026 square feet, 1,097 parking stalls, 54 dock high doors, and seven grade-level doors. Off-site improvements to accommodate project operations are necessary and would include the widening of Valley Boulevard at the northeast corner of the intersection with S. Lemon Avenue to include an additional right-turn lane from Valley Boulevard to S. Lemon Avenue.

The Proposed Project is located between Valley Boulevard to the south, S. Lemon Avenue to the west, Paseo Del Prado to the north, and an existing industrial development to the east. Construction is anticipated to occur between August 2025 to December 2026. Based on a review of aerial photographs, Staff found that the nearest sensitive receptor (e.g., residential development) is located within about 740 feet of the site and a railroad is located in a northeast-southwest orientation adjacent to the site.

South Coast AQMD Comments

Mobile Source Emissions: Inconsistencies in Truck Trip Lengths and Vehicle Miles Traveled (VMT)

The truck trip lengths and VMT assumed in the truck emission calculations are inconsistent across different sections of the Draft SEIR, as noted in the following:

- The calculations in Appendix D-a – Air Quality/GHG Analysis indicate that the truck trip length is **39.90 VMT per truck trip**, referencing the South Coast AQMD Warehouse Actions and Investments to Reduce Emissions (WAIRE) Implementation Guideline under Rule 2305.¹ Based on the estimated average daily truck trips for unrefrigerated and refrigerated warehouse cases in the Draft SEIR (206 and 30 trucks, respectively), Staff calculates approximately **8,219 truck VMT per weekday** for the unrefrigerated warehouse case and **1,197 truck VMT per weekday** for the refrigerated warehouse case.
- Appendix D-a, in the “CalEEMod Inputs- Walnut Business Park, Operations” section, states that the total truck **VMT per weekday** is **8,201** for the unrefrigerated warehouse case and **1,216** for the refrigerated warehouse case.² For the unrefrigerated warehouse case, dividing **8,201 truck VMT per weekday** by 206 trucks per weekday, results in **39.8 VMT per truck trip**. Similarly, for the refrigerated warehouse case, dividing **1,216 truck VMT per weekday** by 30 trucks per weekday, results in **40.5 VMT per truck trip**. Therefore, the calculated truck trip length for both cases differ from the value referenced in Appendix D-a (**39.90 VMT per truck trip**).

Therefore, to ensure accuracy and consistency throughout the Draft SEIR and its Appendices, it is recommended that the Lead Agency:

1. Revise the truck trip lengths and VMT values to be consistent across all sections in the Draft SEIR and its Appendices.
2. Update the CalEEMod mobile source emission calculations using accurate and consistent truck trip lengths and VMT accordingly for evaluating regional impacts, localized impacts, and other associated analyses.
3. Include the revised results in the Final SEIR.

Additionally, as noted earlier in this letter, it appears that there is a railroad located adjacent to the site, but the Draft SEIR does not explain whether the Proposed Project will involve transportation by rail. If, for example, supplies and equipment are delivered to the project site by rail, the air quality analysis and Health Risk Assessment (HRA) in the Draft SEIR should be revised to include the details regarding the number of trains that will be needed, and the quantified emissions from the locomotive engines from the associated rail trips.

Localized Significance Threshold Analysis During Construction and Operation

The localized significance threshold (LST) analysis in the Draft SEIR appears to incorrectly rely on the LST screening tables to determine the significance of localized air quality impacts. As indicated in Table 3-2 of the LST methodology,³ these screening tables are not applicable for projects larger than five acres. Since the Proposed Project site size is 23 acres and is located in close proximity to sensitive receptors, including residential uses as noted earlier in this letter, reliance on the LST screening tables may underestimate localized air quality impacts. Therefore, it is recommended that the Lead Agency conduct project-specific dispersion modeling to

¹ South Coast AQMD. 2021, June. WAIRE Implementation Guidelines, Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program, Rule 316 – Fees for Rule 2305. <http://www.aqmd.gov/docs/default-source/planning/fbmsm-docs/waire-implementation-guidelines.pdf>

² Draft SEIR – Walnut Business Park Project for City of Walnut (Feb. 2025). Appendix D-a – Air Quality/GHG Analysis, p. 22.

³ South Coast AQMD Final Localized Significance Threshold Methodology available at: <https://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf>

accurately assess the localized air quality impacts from both construction and operational phases of the Proposed Project and include the results in the Final SEIR.

Underestimation of TRU Idling Duration Assumptions in “Appendix D-b – Health Risk Assessment” and “OpOffRoad Emissions COW-05” Spreadsheet

There is an inconsistency in the assumed Transport Refrigeration Unit (TRU), the auxiliary diesel engine, idling duration between two different sections of the calculations, as outlined below:

1. Appendix D-b states 30 truck trips with TRUs per day (15 round trips per day), idling two hours per day per truck.⁴
2. Spreadsheet, “OpOffRoad Emissions COW-05”, assumes a TRU idling duration of only 30 minutes per truck.

Of these two assumptions, the 2-hour idling duration for the TRU diesel engine is more conservative than 30 minutes. However, according to the California Air Resources Board (CARB)'s Proposed Amendments to the Airborne Toxic Control Measure (ATCM) for In-Use Diesel-Fueled TRUs⁵, a TRU-equipped vehicle enters the facility fully loaded (inbound) and exits the facility fully loaded (outbound), with each loading and unloading process taking approximately two hours – totaling four hours per visit.

Given this operational reality, the Draft SEIR may have substantially underestimated the exposure of nearby residents to diesel exhaust emissions, which are a significant source of cancer risk to the surrounding community. The assumption of only 30 minutes of TRU idling duration is likely unrealistic, especially considering the large number of TRUs that will be utilized. Therefore, to ensure an accurate and consistent assessment of human health risks, it is recommended that the Lead Agency either:

1. Revise the Proposed Project to include a project design feature in the Draft SEIR that would limit the TRU idling time within the site to less than 30 minutes; or
2. Revise the HRA to reflect a TRU idling duration of four hours or another amount if supported by substantial evidence.

Discrepancy in Emission Rates Between Appendix D-b and AERMOD Modeling Files for Line Volume Sources

Staff identified a discrepancy in the source emission rates used in the AERMOD modeling within the CEQA documentation. Specifically, Appendix D-b states: “A unit emission rate of 1 gram per second was used for both construction and operational model runs. The unit emission rates were proportioned over the poly-area sources for on-site sources and between the number of adjacent volume sources for the off-site truck routes.” However, upon review of the AERMOD modeling files, Staff observed that the source emission rate for the line volume is not consistent with the stated one gram per second. This discrepancy raises concerns regarding the accuracy of the modeled ground-level concentrations and the potential underestimation of exposure levels for nearby sensitive receptors. Inaccurate assumptions regarding the emission rate may result in an underestimation of potential health risks from diesel particulate matter. It is critical that the

⁴ Draft SEIR Walnut Business Park Project for City of Walnut (Feb. 2025), Appendix D-b – Health Risk Assessment, p.10.

⁵ California Air Resource Board. Proposed Amendments to the Airborne Toxic Control Measure for In-Use Diesel-Fueled Transport Refrigeration Units (TRU) and TRU Generator Sets, and Facilities Where TRUs Operate. Appendix I. p. 39. Table II.G.1. Accessed at: <https://ww2.arb.ca.gov/sites/default/files/barcu/board/rulemaking/tru2021/appi.pdf>

AERMOD inputs accurately reflect the emission rates used to ensure a reliable assessment of health risks to the surrounding community. Therefore, it is recommended that the Lead Agency revise the Draft SEIR to:

1. Clarify the actual emission rates used in the AERMOD modeling files and ensure consistency with the values stated in Appendix D-b.
2. Revise the HRA, if necessary, to reflect the corrected emission rates and provide updated maximum ground-level concentrations.

Missing Plot Files and Additional Clarifications in AERMOD modeling

The AERMOD modeling output Plot Files provided by the Lead Agency on March 4, 2025, contain three Plot Files (PE00G010, PE00G011, and PE00G012), whereas the actual modeling output files in AERMOD includes 12 Plot Files because 12 source groups were established in the AERMOD input file. The missing Plot Files have hindered Staff's ability to review and verify the information provided in the spreadsheet, "F-RiskCalculation-COW-05".

Additionally, Plot File, "PE00G011", which corresponds to the sources, "Building 4 Offsite Truck Route" and "Building 4 Onsite", reports an AERMOD Output Annual Average (in units of micrograms per cubic meter or $\mu\text{g}/\text{m}^3$) of 5.848 (cell F18) and 5.262 (cell F19) in the tab "1 TAC Output_Res" in the "F-RiskCalculation-COW-05" spreadsheet. However, in the actual AERMOD modeling file, the reported ground-level concentration for these two sources together is 54.343 $\mu\text{g}/\text{m}^3$. Because these values do not match, the Lead Agency is advised to review the data, identify the cause of this inconsistency and re-run the analysis.

Furthermore, in the same tab of "F-RiskCalculation-COW-05" spreadsheet, "Building 1 Yard Area" source shows the actual emission rate is 1.66E-4 grams per second (g/s) (cell F8) and "Building 2, 3, 4 Yard Areas" show the actual emission rates are zero (cells E2, E16, and E20). However, the AERMOD input modeling files indicate non-zero emission rates for these sources, and the AERMOD output files report annual average concentrations of 3.685 $\mu\text{g}/\text{m}^3$, 6.910 $\mu\text{g}/\text{m}^3$, 2.528 $\mu\text{g}/\text{m}^3$, and 5.262 $\mu\text{g}/\text{m}^3$ for 1-, 2-, 3-, and 4-Yard Area Buildings, respectively. The ground-level concentrations cannot be quantified from an emission rate of zero as calculated in the spreadsheet. Clarification is needed to address this discrepancy, and recalculation of actual emission rates or ground-level concentrations for 2-, 3-, and 4-Yard Area Buildings is recommended.

Lastly, the worker cancer risks (CRs) were not calculated, while only residential and school CR values are included in the modeling files and Draft SEIR. An explanation is necessary to address this omission.

Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program

Since the Proposed Project consists of the development of a 392,488 square foot warehouse, once the warehouse is occupied, the Proposed Project's warehouse owners and operators will be required to comply with South Coast AQMD Rule 2305 – Warehouse Indirect Source Rule – WAIRE Program and Rule 316 – Fees for Rule 2305. Rule 2305 and Rule 316 aim to reduce regional and local emissions of NO_x and PM, including diesel PM so as to reduce adverse public health impacts on communities located near warehouses. Rule 2305 applies to owners and operators of warehouses greater than or equal to 100,000 square feet. Under Rule 2305, operators are subject to an annual WAIRE Points Compliance Obligation that is calculated based on the

annual number of truck trips to the warehouse. WAIRE Points can be earned by implementing actions in a prescribed menu in Rule 2305, implementing a site-specific custom plan, or paying a mitigation fee. Warehouse owners are only required to submit limited information reports, but they can opt to earn WAIRE Points on behalf of their tenants if they so choose because certain actions to reduce emissions may be better achieved at the warehouse development phase, for instance the installation of solar and charging infrastructure. Rule 316 is a companion fee rule for Rule 2305 to allow South Coast AQMD to recover costs associated with Rule 2305 compliance activities.

Therefore, the Lead Agency is recommended to review Rule 2305 to determine the potential WAIRE Points Compliance Obligation for future operators and explore whether additional project requirements, design features/enhancements, and CEQA mitigation measures can be identified and implemented at the Proposed Project that may help future warehouse operators meet their compliance obligation.⁶ For questions concerning Rule 2305 implementation and compliance, please call (909) 396-3140 or email waire-program@aqmd.gov. For implementation guidance documents and compliance and reporting tools, please visit South Coast AQMD's WAIRE Program webpage.⁷

South Coast AQMD Air Permits and Role as a Responsible Agency

If 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, boilers, etc., air permits from South Coast AQMD will be required. The Final SEIR should include a discussion about the South Coast AQMD rules that may be applicable to the Proposed Project. Those rules may include, for example, Rule 201 – Permit to Construct,⁸ Rule 203 – Permit to Operate,⁹ Rule 401 – Visible Emissions,¹⁰ Rule 402 – Nuisance,¹¹ Rule 403 – Fugitive Dust,¹² Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,¹³ Rule 1113 – Architectural Coating,¹⁴ Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil,¹⁵ Rule 1179 – Publicly Owned Treatment Works Operations,¹⁶ Regulation XIII – New Source Review,¹⁷ Rule 1401 – New Source Review of Toxic Air Contaminants,¹⁸ Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants,¹⁹ Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines,²⁰ etc. It is important to note that if air permits from South Coast AQMD are required, 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.

⁶ South Coast AQMD Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xxiii/r2305.pdf>

⁷ South Coast AQMD WAIRE Program. Accessed at: <http://www.aqmd.gov/waire>

⁸ South Coast AQMD. Rule 201 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>

⁹ South Coast AQMD. Rule 203 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>

¹⁰ South Coast AQMD. Rule 401 available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf>

¹¹ South Coast AQMD. Rule 402 available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>

¹² South Coast AQMD. Rule 403 available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403>

¹³ South Coast AQMD. Rule 1110.2 available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf

¹⁴ South Coast AQMD. Rule 1113 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf>

¹⁵ South Coast AQMD. Rule 1166 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>

¹⁶ South Coast AQMD. Rule 1179 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1179.pdf>

¹⁷ South Coast AQMD. Regulation XIII available at: <https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiii>

¹⁸ South Coast AQMD. Rule 1401 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf>

¹⁹ South Coast AQMD. Rule 1466 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf>

²⁰ South Coast AQMD. Rule 1470 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf>

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 the process for conducting a review of the Proposed Project and issuing discretionary approvals.

For these reasons, the Final SEIR should include a discussion about any and all new stationary and portable equipment requiring South Coast AQMD air permits, provide the evaluation of their air quality and greenhouse gas impacts, and identify South Coast AQMD as a Responsible Agency for the Proposed Project as this information will 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 <https://www.aqmd.gov/home/permits>.

Conclusion

As set forth in Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a-b), the Lead Agency shall evaluate comments from public agencies on environmental issues and prepare a written response at least 10 days prior to certifying the Final SEIR. 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 SEIR. In addition, as provided by CEQA Guidelines Section 15088(c), if the Lead Agency's position is in 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. Staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Zoya Banan, Ph.D., Air Quality Specialist, at ZBanan@aqmd.gov should you have any questions.

Sincerely,

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