



South Coast Air Quality Management District

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SENT VIA E-MAIL:

July 25, 2025

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**Draft Environmental Impact Report (EIR) for the Proposed
Westside Annexation and North Lancaster Industrial Specific Plan (Proposed Project)
(SCH No.: 2024081372)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The City of Lancaster is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. Environmental review under CEQA has been initiated via a Notice of Preparation (NOP) on August 30, 2024, followed by a Draft EIR released on May 28, 2025, with the public comment period open through July 21, 2025. We acknowledge that this comment letter is being submitted after the public comment period closed on July 21, 2025, and appreciate the Lead Agency's offer to consider the following comments.

Based on the Draft EIR, the Lead Agency proposes a two-part initiative: first, the annexation of approximately 7,153 acres of land currently under Los Angeles County jurisdiction; second, the adoption of the North Lancaster Industrial Specific Plan. Together, these actions would authorize up to approximately 38.5 million square feet of industrial and warehouse uses across a 1,860-acre designated industrial zone. The Draft EIR explores potential environmental impacts across multiple categories, including air quality, greenhouse gases (GHG), transportation, biological, cultural resources, noise, geology, and more. The air quality section identifies both construction and operational emissions as having potentially significant and unavoidable impacts.

Although the Proposed Project is located within the jurisdiction of the Antelope Valley Air Quality Management District (AVAQMD), operation of this large-scale project has the potential to generate a high volume of heavy-duty truck traffic¹, including diesel heavy heavy-duty diesel trucks (HHDs) and transportation refrigeration units (TRUs) that would travel beyond the AVAQMD boundary into other air districts, including but not limited to the South Coast AQMD region—particularly to and from the Ports of Los Angeles and Long Beach.²

According to Section 5.13 (Air Quality) of the Draft EIR (see pages 5.13-31 to 5.13-34), the long-term operational emissions for the full buildout of the Proposed Project are discussed and Table 5.13-9 ("Summary of Annexation Area Peak Operational Emissions – Without Mitigation (2040)"), as shown in the following screenshot, summarizes project-wide emissions and compares these emissions to AVAQMD's CEQA air quality significance thresholds.

¹ Draft EIR, p. 5.13-23, On-Site and Off-Site Truck Activity.

² *Ibid.* p. 5-13-21.

Table 5.13-9
Summary of Annexation Area Peak Operational Emissions – Without Mitigation (2040)

Source	Emissions (pounds/day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Annexation Area (2040)						
Summer						
Mobile Source	215.08	546.14	2,382.97	10.13	843.51	222.79
Area Source	542.38	6.67	782.99	0.04	1.25	0.95
Energy Source	0.00	0.00	0.00	0.00	0.00	0.00
Stationary Source	18.38	51.37	46.86	0.09	2.70	2.70
Transport Refrigeration Units Source	113.37	103.52	12.34	0.00	0.67	0.62
Cargo Handling Equipment	5.79	18.82	808.01	0.00	1.53	1.41
Total Maximum Daily Emissions	900.96	833.93	4,117.94	10.91	857.89	236.69
AVAQMD Thresholds	137	137	548	137	82	65
Threshold Exceed?	YES	YES	YES	NO	YES	YES
Winter						
Mobile Source	202.04	581.65	1,860.04	9.60	843.52	222.80
Area Source	467.51	0.00	0.00	0.00	0.00	0.00
Energy Source	0.00	0.00	0.00	0.00	8.23	8.23
Stationary Sources	18.38	51.37	46.86	0.09	2.70	2.70
Transport Refrigeration Units Source	113.37	103.52	12.34	0.00	0.67	0.62
Cargo Handling Equipment	18.38	51.37	46.86	0.09	2.70	2.70
Total Maximum Daily Emissions	767.39	862.77	2,812.02	10.34	856.65	235.75
AVAQMD Thresholds	137	137	548	137	82	65
Threshold Exceed?	YES	YES	YES	NO	YES	YES
Source: Refer to Appendix 11.10.						

As the South Coast AQMD is designated as an extreme nonattainment area for ozone and particulate matter (PM_{2.5} and PM₁₀) and nitrogen oxides (NO_x) and volatile organic compounds (VOC) are precursors to the formation of ozone, we are concerned that a substantial portion of these mobile sources will travel through the South Coast AQMD region and that the quantity of associated emissions may potentially exceed South Coast AQMD's air quality significance thresholds.³ To ensure that the analysis considers the whole of the Proposed Project, including all of the indirect effects, the Lead Agency is recommended to include in the EIR an evaluation of the portion of indirect source emissions associated with mobile sources that would be expected to transit within the South Coast AQMD jurisdiction and compare these values to South Coast AQMD's air quality significance thresholds. When quantifying these emissions, the analysis is recommended to rely on the maximum potential one-way trip distance anticipated to occur from the border of AVAQMD to the farthest anticipated end-point within with the South Coast AQMD jurisdiction. By analyzing and disclosing the portion of emissions that would occur within South Coast AQMD's jurisdiction, a more accurate assessment of all regional impacts would provide transparency and clarity for reviewers.

³ South Coast AQMD Air Quality Significance Thresholds can be found at: <https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf>

Moreover, if the analysis indicates that significant adverse air quality impacts would occur within South Coast AQMD's jurisdiction, feasible mitigation measures would also need to be identified to lessen or eliminate these impacts. The Lead Agency is recommended to rely on the guidance provided in South Coast AQMD's CEQA Air Quality Handbook and related guidance available on our website⁴ when preparing the air quality and GHG analyses. It is also recommended that the Lead Agency use the California Air Pollution Control Officers Association's California Emissions Estimator Model (CalEEMod)⁵ software, to quantify emissions of air pollutants from typical land use development project

To support the identification of feasible mitigation measures, the Lead Agency is recommended to consider the types of strategies typically applied to warehouse and industrial projects in our region. These include, but are not limited to, the following:

1. Require zero-emission (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 CARB'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 for use.

2. Require a phase-in schedule to incentivize the use of cleaner operating trucks to reduce any significant adverse air quality impacts.
3. Limit the daily number of trucks allowed at the Proposed Project to levels analyzed in the Final EIR. 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.

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 Act⁶
2. South Coast AQMD 2022 Air Quality Management Plan,⁷ specifically:
 - a) Appendix IV-A – South Coast AQMD's Stationary and Mobile Source Control Measures

⁴ South Coast AQMD's CEQA Air Quality Handbook and other resources for preparing air quality analyses can be found at: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>.

⁵ CalEEMod is available free of charge at: www.caleemod.com.

⁶ 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/system/files/media/warehouse-best-practices.pdf>

⁷ South Coast AQMD, 2022 Air Quality Management Plan (AQMP) available at <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan>

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.⁸

South Coast AQMD staff are available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. I can be reached at swang1@aqmd.gov. Thank you for the opportunity to provide comments.

Sincerely,

Sam Wang

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Planning, Rule Development & Implementation

MK:BR:SW

ODP250719-01

Control Number

⁸ United States Environmental Protection Agency (U.S. EPA), Mobile Source Pollution - Environmental Justice and Transportation available at <https://www.epa.gov/mobile-source-pollution/environmental-justice-and-transportation>