South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:
nperez@cityofperris.org

July 25, 2025

Nathan Perez, Senior Planner
City of Perris, Planning Division
135 North "D" Street
Perris, CA 92570

Draft Environmental Impact Report (Draft EIR) for the Perris Airport Logistics Center Project (Proposed Project) (SCH No: 2023100540)

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to review the above-mentioned document. The City of Perris 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 which are organized by topic of concern.

Summary of Proposed Project Information in the Draft EIR

Based on the information presented in the Draft Environmental Impact Report (Draft EIR), the proposed Perris Airport Logistics Center Project is located in the southern portion of the City of Perris in Riverside County, within the South Coast Air Basin. The Project site lies southeast of the intersection of East Ellis Avenue and Goetz Road and shares interior property boundaries with the Perris Valley Airport runway. The site is approximately 82.71 net acres consisting of seven parcels, which would be merged into two parcels: Site 1 and Site 2. The two sites are separated by the airport runway and connected only at their northern ends.[1] The Project site is zoned for Light Industrial and General Industrial uses and is situated approximately 0.9 miles west of the I-215 Freeway.[2] Existing site conditions include undeveloped land with native vegetation, commercial equipment storage in the southwestern portion, and limited infrastructure such as a gravel parking area, perimeter fencing, minimal landscaping, and a septic system with a leach field. Additionally, the site contains two aboveground diesel fuel storage tanks (approximately 550 gallons and 200 gallons in capacity), with secondary containment provided for the larger tank. [3]

Historically, the site was used for agricultural purposes, which may have involved the use and storage of pesticides, herbicides, and fertilizers. However, given that the site has since been disturbed by grading and/or covered with fill material and structures, potential residual agricultural chemicals in near-surface soils are not considered to pose a significant environmental concern.[4]

The Proposed Project involves construction and operation of two industrial warehouse/distribution buildings on Site 1, and a truck/trailer storage facility on Site 2. Project construction is anticipated to occur over a period of approximately two years.The Draft EIR indicates that construction phases

[1] Draft EIR, p. 3-1.
[2] Draft EIR, p. 4.14-10
[3] Draft EIR, pp. 4.3-10, 4.8-11, and 4.8-12.
[4] *Ibid*, p. 4.8-12.

would not overlap. Approximately 186,500 cubic yards of soil import would be required for grading across both sites.[5]

Site 1 – Warehouse/Distribution Facilities
The Proposed Project includes the construction of two industrial buildings on Site 1.

Building 1 would consist of approximately 795,109 square feet, including 28,500 square feet of office space, 766,409 square feet of warehouse space, and a 200-square-foot fire water pump room. The building would be up to 50 feet in height and include 146 dock-high loading doors, three grade-level doors, and a dedicated rear truck court. It would provide 290 trailer parking stalls, 350 passenger vehicle stalls (including accessible and electric vehicle [EV] stalls), and 20 bicycle parking spaces.[6]

Building 2 would total approximately 71,961 square feet, including 6,500 square feet of office space and 65,461 square feet of warehouse space. The building would be up to 45 feet in height and include approximately 10 ground-level delivery doors with a rear truck court. Parking provisions include 126 passenger vehicle spaces, 25 EV stalls (6 with chargers and 19 with future-ready infrastructure), and 5 bicycle spaces. [7]

Site 2 – Truck/Trailer Storage:
Site 2 is proposed primarily for truck and trailer storage and would include a 100-square-foot guard house with two automobile parking stalls. The site would provide 291 trailer parking stalls and 20 tractor parking stalls.[8] Utility infrastructure improvements for Site 2 would include stormwater drainage, water quality systems, water and sewer connections (including a private sewer line traversing the site), as well as electricity, natural gas, and telecommunications systems.[9]

Operational Equipment and Infrastructure:
The operational phase would involve several equipment types and infrastructure components, including:

- *Fire Water Pumps and Hudrant Lines:* Building 1 will be equipped with a diesel fire water pump housed in a dedicated 200-square-foot pump room. Building 2 will also include a diesel fire water pump, although the dimensions of its pump room have not been specified. Infrastructure improvements for the project will include the installation of fire hydrant lines.

- *Forklifts:* On-site elecrtict forklifts or compressed natural gas-powered, with the necessary electrical charging stations provided.[10]

[5] Draft EIR, p. 4.2-22.
[6] Draft EIR, pp. 2-4.
[7] *Ibid.*
[8] Draft EIR, Figure 4.2-1.
[9] *Ibid*, pp. 2-9 through 2-11.
[10] Figure 4.2-1.

- *Truck Plug-in Hookups:* Loading docks will offer electric hookups to eliminate engine idling, including for Transportation Refrigeration Units (TRUs), which will be required to connect while stationary.[11]

- *Utilities Infrastructure:* The project includes the installation of on-site storm drain, water quality, water, sewer, electric, natural gas, and telecommunications infrastructure systems to serve the proposed warehouse buildings and guard shack.[12]

- *Private Lift Station and Sewer Lines:* A private sewer line with a private lift station on Site 1 will be constructed to convey flows to the existing Eastern Municipal Water District (EMWD) sewer main, which will be upsized. A separate EMWD domestic waterline and an eight-inch recycled waterline will also be constructed along Goetz Road and Ellis Avenue for irrigation of public and private landscape areas.

- *Renewable Energy:* The project includes installation of on-site solar infrastructure.

South Coast AQMD Comments

Demolition Phase from Construction Emissions Analysis

The Draft EIR identifies existing onsite features, including a gravel parking area, two aboveground diesel fuel storage tanks, a septic system with leach field, commercial equipment storage, fencing, and minimal landscaping.[13] However, the Draft EIR does not describe the fate of these existing components, nor does it include a Demolition Phase in the CalEEMod construction modeling or in the environmental analysis. As a result, potential emissions associated with their removal have likely been omitted, leading to underestimation of construction-related emissions and possible unaddressed hazards. Specifically, the Draft EIR does not disclose how the existing septic system and leach field will be handled, whether they will be removed, abandoned, or replaced. Septic system decommissioning may involve the handling of contaminated soil, residual waste, or generate localized emissions and dust. Similarly, removal of diesel fuel tanks could result in the release of hazardous substances if not properly managed. South Coast AQMD recommends that the Lead Agency: 1) clarify whether demolition, clearing, or tank/system removal is anticipated; 2) include those activities in the CalEEMod construction emissions analysis as a distinct Demolition Phase; 3) evaluate any potential hazardous emissions or dust generation from removal of diesel tanks, septic systems, gravel surfacing, or other infrastructure; 4) identify any required remediation, permitting, or mitigation measures related to these demolition or removal activities; and 5) apply appropriate mitigation to reduce any significant emissions, if identified.

Overlapping Construction and Operational Activities

The CalEEMod modeling in Appendix B1 assumes that the Proposed Project will begin operation in 2025.[14] However, the construction schedule shows that architectural coating and paving activities will continue through at least November 2026. This creates an inconsistency in the analysis, as it implies that operational emissions would occur before construction is complete.

[11] Draft EIR, p. 4.2-12.
[12] Draft EIR, p. 2-7.
[13] Draft EIR, p. 4.8-11 and 4.8-12.
[14] Draft EIR, Appendix B1- Air Quality Modeling, CalEEMod Detailed.

Even though the Proposed Project consists of approximately a total of 87.7 acres of land over the course of 26-month construction, the Draft EIR does not analyze the scenario of overlapping between the construction and operational activities. Therefore, South Coast AQMD staff recommends that the Lead Agency revise the air quality analysis section to consider the overlapping construction and operation. The estimated overlapped emissions should then be compared to South Coast AQMD's regional air quality CEQA operational thresholds to determine their level of significance, which should be included in the Final EIR. If the overlapped emissions analysis is not included in the Final EIR, the Lead Agency should provide reasons for not having them supported by substantial evidence in the record.

Construction Volatile Organic Compound (VOC) Emissions Exceed CEQA Thresholds

The Draft EIR states that the Proposed Project would generate a maximum of 172 pounds per day of VOC emissions during construction, specifically during the architectural coating phase in 2026 (Appendix B1 – CalEEMod Outputs). This exceeds South Coast AQMD's CEQA threshold of 75 pounds per day for VOCs, more than doubling the recommended limit. The Draft EIR's conclusion that this exceedance would result in a less than significant impact, based solely on the implementation of MM-AQ-1, is not adequately supported. MM-AQ-1, which requires the use of coatings with a VOC content limit of 50 grams per liter, may reduce emissions to some extent, but is not sufficient to ensure that emissions fall below the significance threshold.

Localized Significance Thresholds Analysis

The localized significance threshold (LST) analysis in the Draft EIR 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,[i] these screening tables are not applicable for projects larger than five acres. Since the Proposed Project site size is 82.71 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 accurately assess the localized air quality impacts from both construction and operational phases of the Proposed Project and include the results in the Final EIR.

Potential Underestimation of Emissions Due to Imprecise Assumptions for Truck Trip Lengths and Trip Rates in Emissions Analysis

Appendix B1 of the Draft EIR explains that air quality impact analysis was based on the assumption that the average truck trip length is 40 miles for Buildings 1 and 2 and 13 miles for Site 2. However, the project site is located approximately 80 miles from the Port of Long Beach and Los Angeles which means that the air quality analysis underestimated the emissions from trucks traveling from the Ports to the project site. For this reason, the Lead Agency is recommended to revise the calculations in the Final EIR by taking a project-specific approach to the vehicle trip length and trip rates by applying more conservative trip lengths such as: 1) designating 80 miles for Port-related trips; and 2) provide substantial evidence and reasoning for designation of 13 miles for local trips. Tailoring these parameters and assumptions to be based on project-specific data will ensure a more accurate assessment of emissions, accounting for the unique circumstances and logistical realities of the Proposed Project.

Warehouse Cold Storage Land Use and the Associated Emissions from Transport Refrigeration Units (TRUs)

The Draft EIR states that the project would include approximately 831,870[15] square feet of warehouse space for industrial warehouse/distribution uses and would not involve manufacturing or chemical processing. While the Draft EIR acknowledges that truck operators with TRUs would be required to plug into electric units at loading docks, and includes general operational guidelines intended to reduce emissions from TRUs, it doesn't quantify the number of TRUs expected to serve the site or the associated operational emissions.[16] In addition, the Draft EIR did not estimate the potential air quality impacts associated with trucks and trailers with TRUs serving the Project. The unmitigated air pollutant emission estimates provided in Section 4.2 – Air Quality of the Draft EIR, were modeled using the CalEEMod. Although CalEEMod can estimate air pollutant emissions from area, energy, and mobile sources, the current version of CalEEMod does not account for air pollutant emissions from trucks and trailers with TRUs. South Coast AQMD staff recommends that the Final EIR: 1) include an estimate of the number of TRU-equipped vehicles expected during project operations; 2) clarify how the all-electric TRU requirement will be implemented, monitored, and enforced; 3) confirm whether commercially available electric TRUs are feasible and available for the types of vehicles expected to serve the project and if electric-only TRUs are not commercially viable for all use cases, the Draft EIR should evaluate emissions from diesel-powered TRUs and provide appropriate mitigation; 4) disclose whether any flexibility or exceptions are allowed (e.g., for power outages, equipment failure, or tenant operations); 5) evaluate potential TRU emissions if enforcement is not feasible or electric-only operations are not feasible in all scenarios; and 6) calculate the cancer risk or health impacts associated with these TRUs.

Errors in the Operational Emissions from Stationary and Portable Sources

The Draft EIR states that operational criteria pollutant emissions are expected from the use of stationary source, diesel-fired emergency fire pumps and a standby generator.[17] However, based on the CalEEMod output tables provided in Appendix B1, the modeling inputs for these engines list "0" for equipment count, horsepower, and hours of operation,[18] suggesting that emissions from these stationary engines were not actually included in the operational air quality analysis. Additionally, the Draft EIR does not appear to evaluate emissions from other commonly used stationary or portable sources that may reasonably be expected as part of a large-scale industrial warehouse/distribution facility.

However, given the Proposed Project's expansive scale, additional stationary and/or portable sources, which may include but are not limited to internal combustion engines, boilers, and spray booths, are typical equipment that would likely be utilized within the 830,000 square feet of warehouse space plus a dedicated truck and trailer storage facility. Failing to account for these additional potential operational stationary and portable sources and the associated emissions in the analysis could lead to an underestimation of the total operational emissions and their health risks to the sensitive receptors. Therefore, South Coast AQMD recommends that the Final EIR: 1)

[15] 766,409 square feet + 65,461 square feet. Draft EIR, pp. 2-4.
[16] Draft EIR, p 4.2-12.
[17] Draft EIR, p. 4.2-29.
[18] Appendix B1-CalEEMod, p. 41.

clearly identify all stationary and portable sources reasonably expected during operation; 2) include emission estimates for those sources in both the CalEEMod and AERMOD modeling, as applicable; and 3) revise the operational emissions and health risk analyses to reflect worst-case, permitted operational hours for these sources.

Use of Outdated AERMOD and AERMAT Model Versions

Appendix B-2 of the Draft EIR indicates that AERMOD version 19191 and AERMET version 16216 were used for the health risk assessment modeling. However, AERMOD version 19191 was replaced by version 21112 on April 22, 2021; and AERMET version 16216 was replaced by version 18081 on April 24, 2018. U.S. EPA's current preferred and recommended model versions, as of the latest release, are AERMOD version 24142 and AERMET version 24142, released in April 2024.[19] Use of outdated model versions is inconsistent with EPA's Guideline on Air Quality Models (40 CFR Part 51, Appendix W) and may result in inaccurate or non-conservative health risk estimates. To ensure accuracy, consistency with federal modeling guidelines, the Lead Agency should re-run the dispersion modeling using the most recent EPA-recommended versions of AERMOD and AERMET (version 24142) and revise the health risk results accordingly.

Errors in the Health Risk Analysis

The HRA prepared for the Project and presented in Appendix B of the Draft EIR concluded that residences near the Project site would be exposed to diesel PM emissions that would result in cancer risks of approximately 6.6 chances per million during the combined construction and operation of the Project.[20] Since the Project's cancer risks were below the South Coast AQMD's significance threshold of 10 chances per million, the Draft EIR concluded that the Project would have a less than significant health risk impact. South Coast AQMD is concerned that the Lead Agency may have underestimated the Project's potential health risk impacts due to modeling assumptions not supported by substantial evidence. Specifically:

1- <u>Underestimated Idling Duration Assumption:</u>
The Lead Agency assumed an idling duration of 15 minutes for onsite heavy-duty trucks when evaluating the Project's health risk impacts. CARB's Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling (ATCM) restricts trucks from idling longer than five minutes. However, the ATCM has an exemption for trucks equipped with a diesel engine meeting the optional nitrogen oxides (NOx) idling emissions standard when operating outside of 100 feet of a restricted area (e.g., residences, schools).[21] Because trucks starting with model year 2008+ are clean-idle certified, many of the trucks operating within the Project site could idle longer than five minutes. According to Table 4.4.2-5 of the EMFAC2021 Volume III Technical Document, heavy-duty trucks can idle for as long approximately five hours in any one location, well above the 15-minute idling duration assumed in the HRA.[22] To fully evaluate the Project's potential unmitigated health risk impacts, the Lead Agency is recommended to revise the modeling

[19] EPA's Air Quality Dispersion Modeling - Preferred and Recommended Models, Accessible at: https://www.epa.gov/scram/air-quality-dispersion-modeling-preferred-and-recommended-models
[20] Draft EIR, Appendix B2- HRA Analysis, p 870.
[21] CARB. Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling. Accessible at: https://ww2.arb.ca.gov/sites/default/files/2022-06/13_CCR_2485_OAL_06222022-2_ADA_06272022_0.pdf
[22] CARB. EMFAC2021 Volume III Technical Document. Page 161. Table 4.4.2-5. Accessible at https://ww2.arb.ca.gov/sites/default/files/2021-03/emfac2021_volume_3_technical_document.pdf

analysis to reflect at least 30 minutes of idling per truck per day to provide a more realistic estimate of the potential DPM emissions. To ensure consistency and accuracy, the Final EIR should reconcile the mitigation measures with the assumptions relied upon in the emissions modeling and provide justification for the assumptions used.

2- Exclusion of TRU-Related Emissions
As stated in the previous comment regarding TRUs, the Draft EIR does not estimate or model potential emissions from TRU-equipped vehicles, which are a known source of Diesel PM and TACs. These sources are particularly relevant for warehouse projects with cold storage components and should be included in any robust HRA. The Final EIR should include an estimate of diesel PM emissions and health risk associated with TRU operations or provide substantial evidence demonstrating that TRUs will not be present or will not result in significant emissions. If TRUs are expected, the analysis should identify enforceable implementation measures, including plug-in infrastructure, usage monitoring, and contingency plans for power outages or non-electric TRUs.

3- Stationary Source Emissions Not Included in Risk Estimates
While the modeling files reference the presence of an emergency generator and diesel fire pump, no supporting calculations, emissions estimates, or quantified risk results are presented. Specifically, the CalEEMod modeling files confirms that emissions from the emergency standby engine were not included in the Project's GHG analysis. Sections 5.16 and 5.16.1 of the CalEEMod output, which are designated for emergency generators and fire pumps, show blank entries or "0.00" values for critical parameters such as equipment type, fuel type, number of units, operational hours per day/year, bhp, and load factor. [23] These stationary sources are known emitters of diesel particulate matter and should be included in both the emissions inventory and the health risk analysis. Their omission from the Draft EIR results in an incomplete evaluation of the Project's potential health risks under CEQA. South Coast AQMD staff recommends that the Lead Agency quantify emissions from all stationary sources in the Final EIR, including emergency generators and fire pumps, and incorporate them into the cancer risk and chronic hazard index calculations. The Final EIR should also specify testing frequency, fuel type, operational duration, and location of these sources relative to sensitive receptors in the HRA.

As part of our review, South Coast AQMD staff requested that the Lead Agency provide the full set of AERMOD modeling files necessary to independently verify the HRA results, including live EMFAC outputs, emission calculation files (Excel format), AERMOD input/output files, HARP input/output files, and any post-processing files used to derive pollutant concentrations. However, key files such as the .dat input files were not provided, preventing the rerun and verification of the AERMOD analysis. Without these files, it is unclear whether the modeling and health risk assessment are based on appropriate and accurate assumptions.

Potential Operational Emissions from Railroad and Airport

It is unclear if the Proposed Project plans to utilize the BNSF Railway and/or Perris Valley Airport for goods movement as part of its operation. In the event BNSF Railway and/or Perris Valley Airport transportation services are utilized during the Proposed Project's operation phase, it is

[23] Draft EIR, Appendix B1- Air Quality Modeling, CalEEMod Detailed.

possible that the operational emissions in the Draft EIR are underestimated. Thus, the Lead Agency is recommended to revise the operational emissions and include those coming BNSF Railway and/or Perris Valley Airport. If BNSF Railway and/or Perris Valley Airport are not part of the Proposed Project's operation, Staff recommends the Lead Agency clarify this in the Final EIR.

Cumulative Impacts during Operation

As set forth in CEQA Guidelines Section 15130, an EIR must evaluate cumulative environmental impacts resulting from the proposed project in combination with past, present, and reasonably foreseeable future projects. The Draft EIR for the Perris Airport Logistics Center Project identifies 95 active development projects within approximately one mile of the Project site, including industrial, warehouse, and truck terminal uses that are likely to contribute to cumulative air quality and toxic air contaminant (TAC) impacts. However, the cumulative air quality analysis relies solely on a threshold-based approach, stating that if the Proposed Project's emissions do not exceed project-specific thresholds, then it is "generally not considered to be cumulatively significant."[24]

While this approach may be appropriate for regional criteria pollutants, it is insufficient for analyzing cumulative impacts from localized TACs such as DPM. The Draft EIR performs a project-level HRA for DPM emissions from the Proposed Project's operation but does not quantify or consider emissions from nearby cumulative sources, many of which are likely to emit DPM through truck activity, backup generators, or TRUs. As such, the Draft EIR lacks a robust cumulative HRA that aggregates DPM emissions from the Proposed Project with those from nearby developments to assess potential cancer risk and chronic health hazards to surrounding sensitive receptors. This is especially critical given the Project's location in an area already burdened by industrial development and designated truck routes.

Therefore, the Lead Agency is recommended to include in the Final EIR: either 1) a qualitative analysis of potential cumulative TAC and health risk impacts that considers DPM emissions from all surrounding industrial and warehouse developments, including foreseeable future projects; or 2) a more detailed and robust quantitative cumulative HRA that aggregates diesel emissions from both the Proposed Project and nearby sources to evaluate total cancer risk and non-cancer health effects in the surrounding community.

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

On May 7, 2021, South Coast AQMD's Governing Board adopted Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program, and Rule 316 – Fees for Rule 2305. Rules 2305 and 316 are new rules that will reduce regional and local emissions of NOx and particulate matter (PM), including diesel PM. These emission reductions will reduce public health impacts for communities located near warehouses from mobile sources that are associated with warehouse activities. Also, the emission reductions will help the region attain federal and state ambient air quality standards. 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

[24] Draft EIR, p. 4.2-21.

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 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. Since the Proposed Project consists of the development of a 643,419 square foot warehouse, the Proposed Project's warehouse owners and operators will be required to comply with Rule 2305 once the warehouse is occupied. Therefore, South Coast AQMD staff recommends that the Lead Agency review South Coast AQMD Rule 2305 to determine the potential WAIRE Points Compliance Obligation for future operators and explore whether additional project requirements and CEQA mitigation measures can be identified and implemented at the Proposed Project that may help future warehouse operators meet their compliance obligation[25]. South Coast AQMD staff is available to answer questions concerning Rule 2305 implementation and compliance by phone or email at (909) 396-3140 or waire-program@aqmd.gov. For implementation guidance documents and compliance and reporting tools, please visit South Coast AQMD's WAIRE Program webpage.[26]

Air Quality Mitigation Measures for NOx and PM Emissions from Construction

Given the long-range plan of the three-year construction period for the Proposed Project, Tier 4 technology may not be the cleanest technology when construction occurs later for individual projects. According to the CARB Strategies for Reducing Emissions from Off-Road Construction Equipment, the implementation of off-road Tier 5 starting in 2027 or 2028 and the Governor's Executive Order in September 2020 requires CARB to develop and propose a full transition to Zero Emissions (ZE) by 2035.[27] Considering the scope of the project, it is crucial to ensure that the levels of construction emissions, specifically NOx and PM_{10}, remain below significant thresholds during the construction period for each proposed individual project. Moving towards achieving this goal, where feasible, involves opting for electric emission-free engines instead of diesel-fueled engines for the construction equipment. This proactive choice not only aligns with environmental concerns but also demonstrates a commitment to minimizing the project's environmental footprints. The abatement of NOx can also be pursued by enforcing greener constructions, such as, limiting the usage of older engines in favor of adopting the latest available technologies, or even incorporating exhaust retrofits such as cutting-edge exhaust aftertreatment techniques. Additionally, several other resources to assist the Lead Agency with identifying additional potential mitigation measures for the Proposed Project are included in the South Coast AQMD's CEQA Air Quality Handbook[28] for both operational and construction emissions.

[25] 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.
[26] South Coast AQMD WAIRE Program. Accessed at: http://www.aqmd.gov/waire.
[27] Presentation can be found at: https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/combined-construction-carb-amp-aqmp-presentations-01-27-21.pdf
[28] https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook

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 recommends incorporating the following mitigation measures and project design considerations into the Final EIR.

Mitigation Measures for Operational Air Quality Impacts

Mobile Sources

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 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.

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.

4. 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.

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 incorporating 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[29]

2. South Coast AQMD 2022 Air Quality Management Plan,[30] 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.[31]

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 CEQA document, whether an EIR, should include a discussion about the potentially applicable rules that the Proposed Project needs to comply with. Those rules may include, for example, Rule 201 – Permit to Construct,[32] Rule 203

[29] 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
[30] 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
[31] 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
[32] South Coast AQMD. Rule 201 available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf

– Permit to Operate,[33] Rule 403 – Fugitive Dust,[34] Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,[35] Rule 1113 – Architectural Coating,[36] Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil,[37] Regulation XIII – New Source Review,[38] Rule 1401 – New Source Review of Toxic Air Contaminants,[39] Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants,[40] Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines,[41] etc. It is important to note that when 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.

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. Moreover, it is important to note that if a Responsible Agency determines that a CEQA document is not adequate to rely upon for its discretionary approvals, the Responsible Agency must take further actions listed in CEQA Guideline Section 15096(e), which could have the effect of delaying the implementation of the Proposed Project. In its role as CEQA Responsible Agency, the South Coast AQMD is obligated to ensure that the CEQA document prepared for this Proposed Project contains a sufficient project description and analysis to be relied upon in order to issue any discretionary approvals that may be needed for air permits. South Coast AQMD is concerned that the project description and analysis in its current form in the Draft EIR is inadequate to be relied upon for this purpose.

For these reasons, the final CEQA document should be revised to 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.

[33] South Coast AQMD. Rule 203 available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf
[34] South Coast AQMD. Rule 403 available at: https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403
[35] South Coast AQMD. Rule 1110.2 available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf
[36] South Coast AQMD. Rule 1113 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf
[37] South Coast AQMD. Rule 1166 available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf
[38] South Coast AQMD. Regulation XIII available at: https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiii
[39] South Coast AQMD. Rule 1401 available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf
[40] South Coast AQMD. Rule 1466 available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf
[41] South Coast AQMD. Rule 1470 available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf

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 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 Jivar Afshar, Air Quality Specialist, at jafshar@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

Sam Wang
Program Supervisor, CEQA IGR
Planning, Rule Development & Implementation

SW:SG:JA

RVC250617-06
Control Number