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Draft Environmental Impact Report (DEIR) for the
South El Monte Athletic Fields and Business Park (Proposed Project)
(SCH No: 2024070062)

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to review the above-mentioned document. The City of South El Monte 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 DEIR

Based on the DEIR, the Project involves development of a warehouse, a public park, and associated surface parking and landscaping on a 21.17-acre site. The warehouse component would occupy approximately 10.20 acres on the eastern portion of the site, while the future park component, to be dedicated to the City, would encompass approximately 10.97 acres on the northwestern portion of the site. The Project also includes installation of a digital billboard sign, approximately 70 feet in height with two displays, within the future park area on the northern portion of the site.[1]

The warehouse would have approximately 201,815 square feet (sf) of warehouse space, 10,000 sf of ancillary office on the first floor, and 10,000 sf of ancillary office on the mezzanine level for a total 221,815 sf of building space.[2] The building would have a total of 277 passenger vehicle parking spaces located along the northwest and southeast sides of the warehouse. The southeast parking lot would have 40 truck trailer parking spaces, allow access to the 27 dock doors, and be shielded by a 14-foot concrete screen wall. In addition, an 8-foot tall wrought iron fence would surround the perimeter of the warehouse site.[3]

Project construction is anticipated with duration of approximately 12 months. Grading activities would require approximately 17,300 cubic yards of export.[4] The Project site is located at 825 Lexington-Gallatin Road in the City of South El Monte (City), County of Los Angeles, California.[5] Based on a review of aerial photographs, South Coast AQMD staff found that the nearest sensitive receptor (e.g., residential development) is located 40 feet to the southeast of the Project site.

[1] DEIR, Page 1.
[2] DEIR, Page 5.
[3] *Ibid.*
[4] DEIR, Page 6.
[5] DEIR, Page 1.

South Coast AQMD Comments

Import and/or Export Information During Construction

The Proposed Project's construction activities include site preparation, grading, building construction, paving, and architectural coating. The DEIR identifies that grading activities would require the export of approximately 17,300 cubic yards of earthwork materials.[6] However, the DEIR does not identify the specific servicing landfill or disposal site for exported materials, nor does it provide the distance between the Project site and the disposal location. In the CalEEMod modeling, a default haul truck travel distance of 20 miles was assumed.[7] If the actual disposal site is located farther than 20 miles from the Project site, the current modeling assumptions would underestimate emissions associated with hauling activities. To ensure accurate emissions estimates, it is recommended that the Lead Agency identify the specific landfill or soil export site that would serve the Project, document the haul distance, and update the CalEEMod assumptions accordingly.

Concept Design and Orientation

Based on the DEIR, the Proposed project would have 27 dock doors[8] located on the south side of the building near Lexington-Gallatin Road.[9] Based on the aerial view, South Coast AQMD staff is concerned about the loading dock orientation of the Proposed Project. These loading docks face Lexington-Gallatin Road, where sensitive receptors (e.g., residences) are located. As a result, South Coast AQMD staff recommends that the Lead Agency re-consider the Proposed Project buildings' design/orientation, such as placing loading docks further away from the sensitive receptors, to help reduce the impacts of the operational activities on the sensitive receptors. In the event that the Proposed Project's design is revised, the Lead Agency should include the new design and its associated analysis (e.g., emissions calculations, HRA) in the Final EIR.

Use of South Coast AQMD's Mass Rate Localized Significance Threshold (LST) Look-Up Table to Analyze the Proposed Project's Localized Air Quality Impact is not Consistent with Guidance for the LST Methodology

The localized significance threshold (LST) analysis in the DEIR 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,[10] these screening tables are not applicable for projects larger than five acres. Since the Proposed Project site size is approximately 21 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.

[6] Appendix C – Air Quality Assessment, page 6.
[7] Appendix C, page 127.
[8] DEIR, page 3-14.
[9] *Ibid*, Figure 3-8, page 3-13.
[10] 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

Consideration of Emergency Generator Emissions in Project Analysis

The Draft EIR indicates, for purposes of analysis, it conservatively assumed installation of diesel-powered backup emergency generator.[11] However, CalEEMod inputs do not include emergency generator in its analysis.[12] Omitting the emergency generator results in an underestimation of project emissions. Accordingly, it is recommended that the Lead Agency revise the CalEEMod inputs in the Final EIR to include the diesel-powered backup emergency generator and assume 200 hours per year of operation.

It should be noted that South Coast AQMD permit for the emergency standby engine is required. Such permits typically establish a potential-to-emit (PTE) limit that allows operation of up to 200 hours per year, including a maximum of 50 hours per year for maintenance and testing.

Use of Outdated AERMOD and AERMAT Model Versions

According to the modeling files shared with South Coast AQMD's staff, it appears that AERMOD version 22112 and AERMET version 16216 were used for the health risk assessment (HRA) modeling. However, 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.[13] 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.

Inconsistent AERMOD Emission Rate

Upon reviewing the AERMOD HRA modeling files, South Coast AQMD staff identified that a unit emission rate of 1 g/s was used for off-site and on-site trucks, emergency generator, and docks. whereas the actual emission factors from the on-site truck running and idling exhaust were applied to all other sources in the modeling. It is crucial to scale the modeled predicted ground-level concentrations to the actual ground-level concentration by using the actual emission rate to determine the actual cancer risks from the off-site trucks. The Lead Agency should verify that the estimated cancer risks from off-site trucks and the on-site truck running and idling exhaust are combined to calculate the total cancer risks.

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 nitrogen oxides (NOx) and particulate matter (PM), including diesel PM. These

[11] DEIR, page 4.7-15.
[12] DEIR, Appendix C, page 137.
[13] 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

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 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[14]. 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.[15]

Incompatible land use issue based on CARB and South Coast AQMD's guidance: sitting warehouses (proposed high-cube warehouse in four buildings) within close proximity to existing and new sensitive land uses (residential areas).

South Coast AQMD is concerned about the potential health impacts of siting the warehouse building in close proximity to existing sensitive land uses (high-density residential areas), since the operation of warehouse generates and attracts heavy-duty diesel-fueled trucks that emit Diesel Particulate Matter (DPM). Based on a review of aerial photographs, South Coast AQMD staff found that the nearest sensitive receptor, such as a mobile home park, is located at approximately 40 feet southeast of the Proposed Project site. Also, according to the DEIR, the truck routes and loading docks/truck idling will be located very close to existing residential areas (~40 feet). When the health impacts from the Proposed Project are added to the existing background, existing residents living in the surrounding communities will likely face even greater exposure to air pollution and bear a disproportionate burden of increasing health risks. According to CARB guidance, air pollution levels can be significantly higher within 500 feet (approximately 150 meters) of freeways or busy traffic corridors, adversely impacting human health. Consequently, the Lead Agency is recommended to follow CARB and South Coast AQMD land-use guidance to ensure that sensitive receptors are not heavily affected by the warehouse truck activities and freeway emissions. This guidance includes:

[14] 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.
[15] South Coast AQMD WAIRE Program. Accessed at: http://www.aqmd.gov/waire.

1) The California Air Resources Board's (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective*[16] is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process with additional guidance on strategies to reduce air pollution exposure near high-volume roadways available in CARB's technical advisory.[17]

2) The South Coast AQMD's *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*[18] includes suggested policies that local governments can use in their General Plans or through local planning to prevent or reduce potential air pollution impacts and protect public health. It is recommended that the Lead Agency review this Guidance Document as a tool when making local planning and land use decisions.

By adhering to these essential guidance documents and implementing proactive Mitigation Measures (MMs), the lead agency can avoid, eliminate or reduce the adverse impacts of warehouse and truck activities on public health, ensuring that vulnerable communities are adequately protected from disproportionate exposure to air pollution.

Emission Reductions from Health Risk Strategies

South Coast AQMD is concerned about the potential public health impacts of siting existing and new sensitive populations within the proximity of existing air pollution sources (e.g., freeway, railroad). For this reason, prior to approving this Proposed Project as well as any future development projects, the Lead Agency is recommended to consider the impacts of air pollutants on people who will live in the new project area and provide effective mitigation. Additionally, South Coast AQMD suggests that the Lead Agency review and apply the guidance provided in: 1) the California Air Resources Board (CARB) Air Quality Land Use and Handbook: A Community Health Perspective[19] which provides criteria for evaluating and reducing air pollution impacts associated with new projects involving land use decisions; and 2) CARB's technical advisory which contains strategies to reduce air pollution exposure near high-volume roadways.[20]

Many strategies are available for residential receptors to reduce being exposed to particulate matter, including, but not limited to, HVAC systems equipped with filters rated at a minimum efficiency reporting value (MERV) 13 or higher air filtration capabilities. In some cases, MERV 15 or better is recommended, for building design, orientation, location, vegetation barriers, landscaping screening, etc. Enhanced filtration units are capable of reducing exposure. However, enhanced filtration systems have limitations. For example, filters rated MERV 13 or higher are

[16] CARB's *Air Quality and Land Use Handbook: A Community Health Perspective* can be found at: ARB's Community Health: 2005-04-00 ARB's Air Quality and Landuse Handbook: A Community Health Perspective.
[17] CARB's technical advisory can be found at: Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways | California Air Resources Board.
[18] South Coast AQMD. 2005. *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*. Available at: http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf.
[19] California Air Resources Board (CARB), Air Quality Land Use and Handbook: A Community Health Perspective, April 2005. Available at: https://ww2.arb.ca.gov/sites/default/files/2023-05/Land%20Use%20Handbook_0.pdf
[20] CARB's Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways. Available at: https://ww2.arb.ca.gov/sites/default/files/2017-10/rd_technical_advisory_final.pdf

able to screen out greater than or equal to 50% of DPM[21] but they have no ability to filter out volatile organic compound (VOC) emissions. Also, in a study that South Coast AQMD conducted to investigate filters rated at MERV 13 or better in classrooms,[2223] a cost burden is expected to be within the range of $120 to $240 per year to replace each filter panel. The initial start-up cost could substantially increase if an HVAC system needs to be installed and if standalone filter units are required. Installation costs may vary, including costs for conducting site assessments and obtaining permits and approvals before filters can be installed. Other costs may include filter life monitoring, annual maintenance, and training for conducting maintenance and reporting. In addition, the filters would not have any effect unless the HVAC system is running. Therefore, when in use, the increased energy consumption from each HVAC system should be evaluated in the Final EIR. While the filters operate 100 percent of the time when the HVAC is in use while the residents are indoors, the environmental analysis does not generally account for the times when the residents are not using their HVAC and instead have their windows or doors open or are moving throughout the common space outdoor areas of the Proposed Project. Furthermore, when used filters are replaced with new filters, emissions associated with trucks delivering the new filters and waste disposal trucks transporting the used filters to disposal sites should be evaluated in the Final EIR. Therefore, any presumed effectiveness and feasibility of a particular HVAC filter should be carefully evaluated in more detail based on supporting evidence before assuming they will sufficiently alleviate exposure to DPM emissions.

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.

[21] U.S. EPA, "What is a MERV rating?" Available at: https://www.https://www.epa.gov/indoor-air-quality-iaq/what-merv-rating.
[22] South Coast AQMD, Draft Pilot Study of High-Performance Air Filtration For Classroom Applications, October 2009. Available at: https://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf.
[23] South Coast AQMD, Draft Pilot Study of High-Performance Air Filtration For Classroom Applications, October 2009. Available at: https://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf.

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[24]

2. South Coast AQMD 2022 Air Quality Management Plan,[25] 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.[26]

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, 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,[27] Rule 203 – Permit to Operate,[28] Rule 401 – Visible Emissions,[29] Rule 402 – Nuisance,[30] Rule 403 – Fugitive Dust,[31] Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,[32] Rule 1113 – Architectural Coating,[33] Regulation XIII – New Source Review,[34] Rule 1401 – New Source Review of Toxic Air Contaminants,[35] Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines,[36] 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.

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

[24] 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
[25] 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
[26] United States Environmental Protection Agency (U.S. EPA), Mobile Source Pollution - Environmental Justice and Transportation. Available at: https://www.epa.gov/mobile-source-pollution.
[27] South Coast AQMD. Rule 201 available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf
[28] South Coast AQMD. Rule 203 available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf
[29] South Coast AQMD. Rule 401 available at: https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf
[30] South Coast AQMD. Rule 402 available at: https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf
[31] South Coast AQMD. Rule 403 available at: https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403
[32] South Coast AQMD. Rule 1110.2 available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf
[33] South Coast AQMD. Rule 1113 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf
[34] South Coast AQMD. Regulation XIII available at: https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiii
[35] South Coast AQMD. Rule 1401 available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf
[36] South Coast AQMD. Rule 1470 available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf

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 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,

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