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

SENT VIA E-MAIL: October 16, 2025

rbrown@cityofmenifee.us
Russell Brown, AICP, Senior Planner
City of Menifee, Community Development Department
29844 Haun Road
Menifee, CA 92586

Draft Environmental Impact Report (EIR) for the Proposed Menifee (Pemcor) Business Park Project (Proposed Project) (SCH No.: 2024071016)

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

Summary of Project Information in the Draft EIR

Based on the Draft EIR, the Proposed Project involves the demolition of an existing residential structure and the subsequent development of 11 industrial buildings, totaling approximately 337,770 square feet.[1] The Proposed Project is planned to include 22 truck loading docks[2] and is anticipated to generate approximately 154 truck trips per day during operation.[3] The site is located at 33521 Zeiders Road in Menifee.[4] Based on a review of current aerial imagery, the nearest sensitive receptor (e.g., residential use) is located approximately 120 feet to the north of the proposed development site. Construction activities are scheduled to commence in winter 2025 and are expected to span approximately 18 months.[5]

South Coast AQMD Comments

Unsupported Truck Trip Distance Assumptions Used in Emissions Modeling

Accurately estimating truck trip lengths is a key parameter when quantifying emissions from mobile sources, especially diesel particulate matter (DPM), oxides of nitrogen (NOx), and greenhouse gases (GHG). The mischaracterization of average trip lengths, for example, can lead to a significant underestimation of a project's air quality impacts. According to Appendix E1: Air Quality and Health Risk Assessment, a weighted truck trip distance was developed and resulted in approximately 31.8 miles per trip.[6] However, the analysis lacks the supporting basis for determining the trip origins and destinations and whether the assumed distances are reflective of actual or anticipated routing patterns of the facility's current or future truck fleet.

[1] Draft EIR. p. 3-1.
[2] *Ibid*. p. 3-7.
[3] *Ibid*. p. 4.17-6.
[4] *Ibid*. p. 3-1.
[5] *Ibid*. p. 3-20.
[6] Appendix E1: Air Quality and Health Risk Assessment. p. 4-4.

As such, the Final EIR should include a clear and defensible rationale for the use of the 31.8 miles. The rationale should be supported by documentation such as empirical data from fleet operations, transportation logistics studies, regional freight movement data, or other sources that demonstrate the applicability and appropriateness of the selected distances. Additionally, if any truck trips associated with the Proposed Project will include port-related activities, the Final EIR should explain this detail and the modeled trip lengths should accurately reflect the mileage between the Proposed Project site and the relevant port(s), such as the Ports of Los Angeles or Long Beach, which are located approximately 82 to 98 miles one-way from the Proposed Project site.

Therefore, the Lead Agency is recommended to either revise the trip distance assumptions to more accurately reflect realistic operational conditions or provide additional evidence substantiating that the selected distances are representative of actual or reasonably foreseeable truck travel patterns associated with the Proposed Project. Failure to provide supporting evidence to validate these assumptions may compromise the accuracy of the emission estimates, conclusions, and the overall integrity of the air quality analysis presented in the Final EIR.

Truck Idling Duration and Emissions Modeling

Appendix E1 indicates that an assumption of 15 minutes of idling per truck per day was used to estimate DPM emissions for the operational health risk assessment (HRA).[7] However, it may not accurately reflect the actual operating conditions of the Proposed Project. The Proposed Project is anticipated to generate approximately 154 truck trips per day, and for a logistics or distribution facility, it is reasonable to expect that individual trucks may experience extended periods of idling due to on-site queuing, security checks, staging, loading, and unloading operations, particularly during peak hours or in constrained circulation areas. As such, a 15-minute idling duration may underestimate actual on-site idling behavior and, consequently, DPM emissions, which are a key contributor to localized health risks.

While the California Air Resources Board (CARB) limits diesel truck idling to five minutes as set forth in the Airborne Toxic Control Measure (ATCM), an exemption from this requirement is allowed for trucks equipped with engines that meet the optional low-NOx idle emission standard, which is typically applicable to model year 2008 and newer trucks. These vehicles, often referred to as "clean idle" certified, are permitted to idle longer than five minutes when situated more than 100 feet from sensitive land uses such as homes and schools.[8] Furthermore, CARB's EMFAC2021 Volume III Technical Document (Table 4.4.2-5) indicates that heavy-duty trucks may idle for up to five hours at a single location under certain conditions.[9] As a practical matter, the idling duration for onsite heavy-duty trucks visiting the Proposed Project site could idle for a much longer duration than what was analyzed in the Draft EIR. Thus, the HRA may have substantially underestimated the full extent of operational health risks associated with the DPM emissions from the anticipated onsite heavy-duty truck activities.

Accurate characterization of idling activity is essential to fully assess a project's potential health risk impacts, particularly for nearby sensitive receptors. Therefore, to ensure the HRA provides a

[7] Appendix E1. p. 4-9.
[8] CARB, Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling was promulgated in Chapter 13 of the California Code of Regulations, Section 2485: Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling, https://ww2.arb.ca.gov/sites/default/files/2022-06/13_CCR_2485_OAL_06222022-2_ADA_06272022_0.pdf
[9] CARB, EMFAC2021 Volume III Technical Document, Table 4.4.2-5, p. 161., available at https://ww2.arb.ca.gov/sites/default/files/2021-03/emfac2021_volume_3_technical_document.pdf

conservative and health-protective estimate of potential exposure, the Lead Agency is recommended to either: 1) revise the operational emissions modeling in the Final EIR to assume a minimum of 30 minutes of idling per truck per day, unless site-specific data or operational constraints justify a shorter duration; or 2) provide empirical evidence, such as facility-specific queuing and processing time studies, vehicle circulation modeling, or comparable industry data, to substantiate the 15-minute assumption as representative of expected operations of the Proposed Project.

Potentially Incorrect Meteorological Data in the Health Risk Assessment Modeling

Appendix E1 of the Draft EIR indicates that meteorological (MET) data from the South Coast AQMD's Perris (PERI) station were used for the air dispersion modeling conducted with AERMOD. Specifically, the modeling utilized five years of PERI station data spanning January 1, 2010, to December 31, 2011, and January 1, 2014, to December 31, 2016.[10] It should be noted that this data corresponds to Version 9 of South Coast AQMD's AERMOD-ready MET dataset, which is no longer available. South Coast AQMD released an updated version of AERMOD-ready meteorological data (Version 11) in October 2024.[11] This updated dataset was developed using the U.S. EPA's AERMET processor (Version 22112), along with AERMINUTE (Version 15272) and AERSURFACE (Version 20060), and reflects current regulatory guidance and processing methodologies.

Based on the updated Version 11 MET data, the closest available station to the Proposed Project site is the Temecula (TMCA) station, not the Perris (PERI) station. While proximity is a consideration, it is important to recognize that the nearest meteorological station may not always be the most representative of site-specific conditions. Therefore, in accordance with South Coast AQMD guidance and U.S. EPA modeling protocols, the Lead Agency is recommended to evaluate the representativeness of available meteorological data, including prevailing wind patterns, topography, and land use, when selecting the appropriate station for dispersion modeling.

To ensure technical accuracy, transparency, and consistency with current South Coast AQMD recommendations, the Lead Agency is recommended to:

- Reassess the selection of meteorological data using the latest Version 11 dataset
- Evaluate the most representative station for the project site (e.g., TMCA versus PERI sites)
- Revise the AERMOD modeling inputs accordingly
- Include updated air quality modeling results in the Final EIR

This approach will ensure that air dispersion modeling is based on the most recent and appropriate meteorological data, thereby supporting a robust and defensible environmental analysis.

Potential Underestimation of Cancer Risk Calculations in Health Risk Assessment

Appendix E1 of the Draft EIR states that the health risk assessment (HRA) for residential receptors evaluates exposure from the third trimester through 30 years of age, resulting in a reported cancer risk of 6.8 in one million, below South Coast AQMD's cancer risk significance threshold of 10 in one million.[12]

[10] Appendix E1. p. 4-8.
[11] South Coast AQMD AERMOD-Ready MET Data Files available at https://www.aqmd.gov/assets/aermet/AERMET_files_And_HRA_Tool.html
[12] Appendix E1. p. 4-25.

However, a review of the technical calculation file provided by the Lead Agency, titled *PEMCOR_HRACalcs*, indicates that third-trimester exposure was only considered during the Year 1 construction phase. Notably, early-life exposure groups, the third trimester, were excluded from the operational phase of the project (Years 3–30), during which DPM emissions from truck activity and other sources continue to be present and may contribute to long-term health risks. This omission may result in an underestimation of the lifetime cancer risk for residential receptors, as early-life exposures are generally associated with higher sensitivity to toxic air contaminants, particularly DPM, which is classified as a carcinogen by the California Office of Environmental Health Hazard Assessment (OEHHA).

Given that the reported excess cancer risk is close to the South Coast AQMD threshold, the exclusion of early-life exposure during the operational period represents a significant limitation in the HRA methodology. Therefore, to ensure a complete and health-protective risk assessment consistent with the OEHHA's Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments (2015),[13] the Lead Agency is recommended to:

- Re-calculate the lifetime cancer risk to include early-life exposure (third trimester) during the entire exposure duration of 30 years, including the operational phase
- Re-evaluate the total excess cancer risk from DPM emissions during both construction and operational activities
- Include the revised HRA and updated results in the Final EIR.

This approach will improve the accuracy and public health defensibility of the environmental analysis and ensure compliance with South Coast AQMD and OEHHA guidance.

Additional Recommended Air Quality and Greenhouse Gas Mitigation Measures and Project Design Features for Consideration

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 to Reduce Operational Air Quality Impacts from 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 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.

[13] OEHHA Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments available at https://oehha.ca.gov/sites/default/files/media/downloads/crnr/2015guidancemanual.pdf

Note: South Coast AQMD staff are 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.

Mitigation Measures to Reduce Operational Air Quality Impacts from Other Area Sources

1. Maximize the use of solar energy by installing solar energy arrays.

2. Use light-colored paving and roofing materials.

3. Utilize only Energy Star heating, cooling, and lighting devices and appliances.

Design Considerations for Reducing Air Quality and Health Risk Impacts

1. Clearly mark truck routes with trailblazer signs so that trucks will not travel next to or near sensitive land uses (e.g., residences, schools, daycare centers, etc.).
2. Design the Proposed Project such that truck entrances and exits are not facing sensitive receptors, and trucks will not travel past sensitive land uses to enter or leave the Proposed Project site.

3. Design the Proposed Project such that any truck check-in point is inside the Proposed Project site to ensure no trucks are queuing outside.

4. Design the Proposed Project to ensure that truck traffic inside the Proposed Project site is as far away as feasible from sensitive receptors.

5. Restrict overnight truck parking in sensitive land uses by providing overnight truck parking inside the Proposed Project site.

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

1. State of California – Department of Justice: Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act[14]

2. South Coast AQMD 2022 Air Quality Management Plan,[15] specifically:

[14] 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
[15] 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

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) Transportation, Air Quality, and Climate Change.[16]

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., one or more air permits from South Coast AQMD will be required. The Final EIR 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,[17] Rule 203 – Permit to Operate,[18] Rule 401 – Visible Emissions,[19] Rule 402 – Nuisance,[20] Rule 403 – Fugitive Dust,[21] Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,[22] Rule 1113 – Architectural Coatings,[23] Regulation XIII – New Source Review,[24] Rule 1401 – New Source Review of Toxic Air Contaminants,[25] and Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines,[26] etc.

It is important to note that if air permits from the South Coast AQMD are required, South Coast AQMD's role under CEQA will become the Responsible Agency of the Proposed Project. Per CEQA Guidelines Section 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. Also, as set forth in CEQA Guidelines Section 15096(h), the Responsible Agency is required to make Findings in accordance with CEQA Guidelines Section 15091 for each significant effect of the project and issue a Statement of Overriding Considerations in accordance with CEQA Guidelines Section 15093, if necessary. Lastly, as set forth in CEQA Guidelines Section 15096(i), the Responsible Agency may file a Notice of Determination.

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

[16] United States Environmental Protection Agency (U.S. EPA) Transportation, Air Quality, and Climate Change available at https://www.epa.gov/transportation-air-pollution-and-climate-change
[17] South Coast AQMD, Rule 201 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf
[18] South Coast AQMD, Rule 203 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf
[19] South Coast AQMD, Rule 401 available at https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf
[20] South Coast AQMD, Rule 402 available at https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf
[21] South Coast AQMD, Rule 403 available at https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403
[22] South Coast AQMD, Rule 1110.2 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf
[23] South Coast AQMD, Rule 1113 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf
[24] South Coast AQMD, Regulation XIII available at: https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiii
[25] South Coast AQMD, Rule 1401 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf
[26] South Coast AQMD, Rule 1470 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf

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.

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.

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 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 are available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Danica Nguyen, Air Quality Specialist, at dnguyen1@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

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

SW:DN
RVC250902-03
Control Number