



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:

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CabazonPlan@rivco.org

Candice Hughes, District 5 Principal Planner

County of Riverside

1080 Lemon Street 12th Floor

Riverside, CA 92502

Notice of Preparation of a Draft Program Environmental Impact Report (Draft PEIR)
for the
Cabazon Infrastructure Plan and Cabazon Community Plan Project
(Proposed Project) (SCH# 2026030377)

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to comment on the above-mentioned document. The following comments provide observations and may include recommendations on the analysis of potential air quality impacts from the Proposed Project that should be included in the Draft PEIR. Please transmit copy of the Draft PEIR upon its completion and public release directly to South Coast AQMD. **In the transmittal, please also provide electronic versions of all appendices and technical documents related to the air quality, health risk, and greenhouse gas analyses in their original format (e.g., not in .pdf), including but not limited to emission calculation spreadsheets, air quality modeling files, and health risk assessment input and output files.**

CEQA Air Quality Analysis

According to the Notice of Preparation of a Draft PEIR, the Proposed Project is a large-scale planning effort that would guide land use and infrastructure decisions over approximately 7,768 acres and prepare the Cabazon area for substantial future growth, including the potential for up to 25,000 housing units over the next 30 years. Since the upcoming Draft PEIR will need to analyze the potential environmental impacts of both the Cabazon Community Plan and corresponding Cabazon Infrastructure Plan, the Lead Agency is recommended to include an evaluation in the Draft PEIR of a reasonably foreseeable scenario which reflects the maximum development intensity that would be allowed under the proposed land use designations and associated infrastructure expansion at full buildout and disclose the air quality, greenhouse gas, and health risk implications of this growth to the fullest extent feasible.

When preparing the air quality and greenhouse gas analyses, the Lead Agency is recommended to rely on the guidance provided in the South Coast AQMD's CEQA Air Quality Handbook and website¹ and utilize the California Air Pollution Control Officers Association's California Emissions Estimator Model (CalEEMod)² software to quantify emissions of air pollutants from the land use development activities associated with the Proposed Project.

¹ 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>.

² CalEEMod is available free of charge at: www.caleemod.com.

The Lead Agency should identify all air pollutant sources related to the Proposed Project and analyze/quantify any and all potential air quality and greenhouse gas impacts that could occur during all phases (including overlapping phases) of construction (including demolition) and operation activities associated with the future development that may result from implementing the Community Plan and making the associated infrastructure improvements identified in the Cabazon Infrastructure Plan. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips, and hauling trips). For the Proposed Project, construction-related emissions should also include infrastructure-related activities such as roadway improvements, wastewater and water system improvements, flood control and drainage improvements, utility expansion, and other infrastructure needed to support future growth. Operation-related air quality and greenhouse gas impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers and air pollution control devices), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality and greenhouse gas impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis. Furthermore, if the Lead Agency elects to rely on South Coast AQMD's Air Quality Significance Thresholds,³ the emissions from the overlapping construction and operational activities should be combined and compared to South Coast AQMD's air quality significance thresholds for *operation* to determine the level of significance.

South Coast AQMD has developed a methodology⁴ to assist lead agencies with analyzing localized air quality impacts from site-specific projects located near sensitive receptors. However, because scale of the Proposed Project is large and programmatic in nature, the screening tables which contain localized significance thresholds (LSTs) cannot be relied upon to determine localized impacts. Instead, the Lead Agency is recommended to evaluate the potential localized air quality impacts from the Proposed Project by conducting air dispersion modeling to determine whether the applicable ambient air quality standards would be exceeded.

If the Proposed Project generates diesel emissions from long-term construction or attracts diesel-fueled vehicular trips, especially if heavy-duty diesel-fueled vehicles will be used, the Lead Agency is recommended to perform a mobile source health risk assessment.⁵

Sensitive receptors are people that have an increased sensitivity to air pollution or environmental contaminants and include schools, daycare centers, nursing homes, elderly care facilities, hospitals, and residential dwelling units. The Proposed Project plans for substantial future residential growth and includes a mix of residential, commercial, mixed-use, light industrial, and heavy industrial land uses within an area that is bisected by Interstate 10 and the Union Pacific rail corridor. Therefore, the Lead Agency is recommended to evaluate the potential health risks to

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>.

⁴ South Coast AQMD's guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

⁵ South Coast AQMD's guidance for performing a mobile source health risk assessment can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>

existing and future sensitive receptors from mobile and stationary sources of toxic air contaminants and disclose those potential health risks in the Draft PEIR. To the extent feasible, the Draft PEIR should identify areas where future sensitive land uses may be exposed to elevated levels of diesel particulate matter (DPM) and other air pollutants, and should include planning-level policies, siting considerations, and mitigation measures to reduce exposures.

Also, 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, spray booths, wastewater-related equipment, electrical infrastructure, etc., one or more air permits from South Coast AQMD will be required, and the role of South Coast AQMD would change from a Commenting Agency under CEQA to a Responsible Agency as defined in CEQA Guidelines Section 15381. The assumptions in the air quality analysis in the EIR will be the basis for evaluating the air permit(s) under CEQA and imposing permit conditions and limits. Questions about air permit requirements should be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385.

In addition, 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 evaluating the applications for air permits. For these reasons, the Draft PEIR should include a discussion about any new stationary and portable equipment requiring South Coast AQMD air permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project, if applicable. Also, as set forth in CEQA Guidelines Section 15086, the Lead Agency is required to consult with all Responsible Agencies with discretionary approval authority over the Proposed Project. Thus, if air permits are required and South Coast AQMD is identified as a Responsible Agency, please let this comment letter serve as South Coast AQMD's request to convene a meeting with the Lead Agency as required by CEQA Guidelines Section 15104 to discuss the scope and content of the environmental information that will need to be included in the Draft PEIR.

To assist with identifying ways to minimize air quality impacts from the Proposed Project, the Lead Agency is also recommended to consult and apply the guidance from the California Air Resources Board (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective*,⁶ which 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. CARB has another helpful technical advisory, *Strategy to Reduce Air Pollution Exposure Near High-Volume Roadways*, which contains additional guidance on strategies to reduce air pollution exposure of Proposed Projects located near high-volume roadways.⁷

Since the Proposed Project will involve local planning and land use decisions, the Lead Agency is recommended to review and consider applying the recommendations contained in the South Coast AQMD *Guidance Document for Addressing Air Quality Issues in General Plans and Local*

⁶ CARB's *Air Quality and Land Use Handbook: A Community Health Perspective* can be found at: <https://www.aqmd.gov/docs/default-source/ceqa/handbook/california-air-resources-board-air-quality-and-land-use-handbook-a-community-health-perspective.pdf>.

⁷ CARB's *Strategy to Reduce Air Pollution Exposure Near High-Volume Roadways*, April 2017, available at: https://ww2.arb.ca.gov/sites/default/files/2017-10/rd_technical_advisory_final.pdf.

Planning,⁸ which 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.

The planning area of the Proposed Project will have future light industrial and heavy industrial land uses which may involve substantial emissions of criteria pollutants and toxic air contaminant emissions which could create concerns regarding land use compatibility with nearby sensitive receptors. The Lead Agency is recommended to include an evaluation of the potential air quality and health risk implications of these land use designations in the Draft PEIR by applying assumptions which reflect a full range of reasonably foreseeable industrial activities that could occur if the Proposed Project is implemented.

The Proposed Project also includes land use designations, such as light industrial and heavy industrial uses, that may facilitate future warehouse and other truck-intensive land uses capable of generating and attracting heavy-duty diesel-fueled trucks that emit DPM, a toxic air contaminant. The South Coast AQMD Multiple Air Toxics Exposure Study (MATES V), completed in August 2021, concluded that the largest contributor to cancer risk from air pollution sources is DPM emissions.⁹ For this reason, South Coast AQMD staff is concerned about the potentially adverse public health impacts of siting new warehouses or expanding existing warehouses within close proximity of sensitive land uses, especially in communities located in or adjacent to multiple other existing warehouses and their associated truck activities. Since the Proposed Project would guide future development, the Draft PEIR should evaluate the potential for future warehouses and other truck-intensive uses and their contribution to cumulative DPM exposures in the vicinity of the Proposed Project. To the extent feasible, the Draft PEIR should also disclose existing cancer risk levels in the project area through the use of available tools such as the MATES V¹⁰ carcinogenic risk interactive map, and evaluate how future development facilitated by the Proposed Project could contribute to cumulative health risks.

According to the MATES V carcinogenic risk interactive map, the area surrounding the Proposed Project appears to have an estimated cancer risk of 413 to 469 cases in one million across multiple grids.¹¹ When the health impacts from the Proposed Project are added to those existing impacts from these other sources of DPM, residents living in the communities surrounding the Proposed Project area will likely face an even greater exposure to air pollution and bear a disproportionate burden of increased health risks.

To minimize the impacts of DPM from the Proposed Project and avoid exacerbating existing conditions, the Lead Agency is encouraged to evaluate either quantitatively or qualitatively the potential health risk impacts to nearby sensitive receptors and if significant impacts are identified, to include mitigation measures in the Draft PEIR (which are discussed later in this letter) that would reduce or eliminate the DPM health risks to the surrounding community.

⁸ 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>.

⁹ South Coast AQMD. August 2021. *Multiple Air Toxics Exposure Study in the South Coast Air Basin V*. Available at: <http://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-v>.

¹⁰ South Coast AQMD. MATES V Data Visualization Tool. Accessed at: [MATES Data Visualization \(arcgis.com\)](#).

¹¹ *Ibid.*

In addition, some warehouses could potentially be receiving and storing materials sterilized with ethylene oxide (EtO), a known carcinogen identified by CARB as a Toxic Air Contaminant and by the U.S. EPA as a Hazardous Air Pollutant. EtO is a flammable, colorless gas used in many industries to make products including antifreeze, textiles, solvents, detergents, and adhesives. EtO is also used to sterilize medical devices, the primary use within South Coast AQMD. Due to concerns of EtO off-gassing from sterilized materials and the associated warehouses that receive and store materials sterilized with EtO, there is a potential that some warehouses could emit EtO and pose a cancer risk to workers and nearby sensitive receptors.

Since the Proposed Project may facilitate future warehouse development, the Lead Agency is recommended to include a scenario in the Draft PEIR which analyzes the potential risk from EtO emissions associated with warehouse storage activities. The Lead Agency is also recommended to notify the project proponent, including the potential future tenants, if known, that if sterilization activities or related operations involving the storage or transport of materials sterilized with EtO are intended to occur at the Proposed Project site, such activities would be subject to the requirements of South Coast AQMD Rule 1405 – Control of Ethylene Oxide Emissions from Sterilization and Related Operations.¹² Rule 1405 contains a variety of requirements applicable to both facilities and certain large warehouses that receive EtO-sterilized products. For the latter, warehouse operators are required to provide records and emissions data through fence-line monitoring or emissions studies to help assess EtO emissions from warehouses. Rule 1405 is intended to minimize EtO emissions from these sources to protect public health, particularly in nearby communities that may be vulnerable to toxic air contaminants.

Lastly, for future development Projects that include warehouse uses involving EtO-sterilized materials, the Lead Agency is recommended to require a project-specific health risk assessment to evaluate the potential health risks from EtO emissions and include this information in the CEQA analysis to facilitate full disclosure of potential health risk impacts.

Mitigation Measures

In the event that the Proposed Project results in significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize these impacts. Any impacts resulting from mitigation measures must also be analyzed. Several resources to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project include South Coast AQMD's CEQA Air Quality Handbook,¹³ South Coast AQMD's Mitigation Monitoring and Reporting Plan for the 2022 Air Quality Management Plan,¹⁴ and Southern California Association of Government's Mitigation Monitoring and Reporting Plan for the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy.¹⁵

¹² South Coast AQMD, Rule 1405 – Control of Ethylene Oxide Emissions from Sterilization and Related Operations. Available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1405.pdf>.

¹³ South Coast AQMD's CEQA Air Quality Handbook, Available at: <https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>

¹⁴ South Coast AQMD's 2022 Air Quality Management Plan can be found at: <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan> (Chapter 4 - Control Strategy and Implementation).

¹⁵ Southern California Association of Governments' 2020-2045 RTP/SCS can be found at: https://www.connectsocial.org/Documents/PEIR/certified/Exhibit-A_ConnectSoCal_PEIR.pdf.

The Lead Agency is recommended to consider including mitigation measures and planning strategies for reducing operational and exposure-related air quality impacts from future development facilitated by the Proposed Project in the Draft PEIR, as follows:

- Avoid locating new sensitive land uses within close proximity to substantial sources of air pollution, including freeways, rail lines, heavy industrial uses, truck-intensive land uses, and other major emission sources, unless appropriate avoidance, minimization, and mitigation measures are incorporated.
- Incorporate planning-level policies and development standards that promote land use compatibility and reductions in air pollution exposure, such as setbacks, buffer areas, site design considerations, and separation between sensitive receptors and substantial air pollution sources.
- Encourage zero-emissions (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), when feasible.. The Lead Agency should require a phase-in schedule to incentivize the use of these cleaner operating trucks to reduce any significant adverse air quality impacts. At a minimum, require the use of 2010 model year¹⁶ that meet CARB's 2010 engine emissions standards at 0.01 g/bhp-hr of particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks. Include environmental analyses to evaluate and identify sufficient electricity and supportive infrastructures in the Energy and Utilities and Service Systems Sections in the CEQA document, where appropriate. Include the requirement in applicable bid documents, purchase orders, and contracts. Operators shall maintain records of all trucks associated with project construction to document that each truck used meets these emission standards, and make the records available for inspection. The Lead Agency should require regular inspections to be conducted to the maximum extent feasible to ensure compliance. South Coast AQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency.
- Limit the daily number of trucks allowed at the Proposed Project to levels analyzed in the Final CEQA document. 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.
- 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.

The Lead Agency is recommended to consider including mitigation measures specific to reducing or eliminating operational air quality impacts from other area sources, as follows:

¹⁶ CARB adopted the statewide Truck and Bus Regulation in 2010. The Regulation requires diesel trucks and buses that operate in California to be upgraded to reduce emissions. Newer heavier trucks and buses must meet particulate matter filter requirements beginning January 1, 2012. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent. More information on the CARB's Truck and Bus Regulation is available at: <https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm>.

- Maximize use of solar energy by installing solar energy arrays.
- Use light colored paving and roofing materials.
- Utilize only Energy Star heating, cooling, and lighting devices, and appliances.
- Use of water-based or low VOC cleaning products that go beyond the requirements of South Coast AQMD Rule 1113.

To further reduce air quality and health risk impacts, the Lead Agency is recommended to incorporate the following design considerations in the Draft PEIR:

- Clearly mark truck routes with trailblazer signs, so that trucks will not travel next to or near sensitive land uses (e.g., residences, schools, day care centers, etc.).
- 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.
- Design the Proposed Project such that any check-in point for trucks is inside the Proposed Project site to ensure that there are no trucks queuing outside.
- Design the Proposed Project to ensure that truck traffic inside the Proposed Project site is as far away as feasible from sensitive receptors.
- Restrict overnight truck parking in sensitive land uses by providing overnight truck parking inside the Proposed Project site.

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 (NO_x) and particulate matter (PM), including DPM. These emission reductions will reduce public health impacts from mobile sources that are associated with warehouse activities on communities located near warehouses. 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 in to earn WAIRE Points on behalf of their tenants if they choose because certain actions to reduce emissions may be better achieved at the warehouse development phase (e.g., the installation of solar and charging infrastructure). Rule 316, the companion fee rule to Rule 2305, which allows the South Coast AQMD to recover costs associated with Rule 2305 compliance activities. Since the Proposed Project is a program-level planning document that may facilitate future warehouse and other truck-intensive land uses that could be subject to Rule 2305, the Lead Agency is recommended to evaluate whether the Draft PEIR can incorporate planning-level policies, development standards, infrastructure considerations, and/or mitigation measures that may support future compliance with Rule 2305 and reduce emissions from warehouse-related operations. In addition, the Lead Agency is recommended to 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 to help future warehouse operators meet their compliance obligation.¹⁷ 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 more information on implementation guidance and the available compliance and reporting tools, please visit South Coast AQMD's WAIRE Program webpage.¹⁸

South Coast AQMD staff is available to work with the Lead Agency to ensure that air quality, greenhouse gas, and health risk impacts from the Proposed Project are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact Jivar Afshar, Air Quality Specialist, at jafshar@aqmd.gov.

Sincerely,

Sam Wang

Sam Wang

Program Supervisor, CEQA IGR

Planning, Rule Development & Implementation

BR:SW:JA

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Control Number

¹⁷ 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>.

¹⁸ South Coast AQMD WAIRE Program. Accessed at: <http://www.aqmd.gov/waire>.