



South Coast Air Quality Management District

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

SENT VIA E-MAIL:

MArechiga@beaumontca.gov

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Melody Arechiga, Senior Planner
City of Beaumont
550 East 6th Street
Beaumont, CA 92223

**Draft Environmental Impact Report (EIR) for the
Beaumont Heights Business Centre Project (Proposed Project)
(SCH No: 2024050220)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to review the above-mentioned document. The City of Beaumont 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 Draft EIR, the Proposed Project consists of: 1) development of four industrial buildings and associated improvements within an approximately 385.6-acre area identified as the Development Site, totaling approximately 5,182,891 square feet (sf) of building area and include 887 loading dock doors; 2) water and recycled water utility improvements would be on an approximately 4.27-acre segment of the Proposed Project site; and 3) transportation improvements along State Route SR 79 and utility installation on the remaining approximately 57.26 acres.¹ The Proposed Project would evaluate two operational options with the following information:

- Option A: Assumes 2,073,156 sf of general warehousing and 3,109,735 sf of high-cube fulfillment center, generating 1,902 two-way truck trips per day.²
- Option B: Assumes 3,109,735 sf of high-cube fulfillment center, 1,000,000 sf of cold storage warehouse, and the remaining 1,073,156 sf for general warehousing, generating 2,054 two-way truck trips per day.³

Based on a review of recent aerial imagery, the nearest existing sensitive receptors (e.g., residential uses) are located approximately 100 feet north and east of the Proposed Project site. Construction is proposed to occur in four phases, with one industrial building constructed during each phase. Under both operational scenarios, construction is anticipated to commence in June 2026 and continue through December 2032.⁴

¹ Draft EIR, p. 3-7.

² *Ibid.* p. 3-9.

³ *Ibid.* p. 3-10.

⁴ *Ibid.* p. 3-23.

South Coast AQMD Comments

Insufficient Dispersion Modeling and Receptor Coverage

The current localized analysis appears to rely on South Coast AQMD's Localized Significance Threshold (LST) screening methodology, which is typically intended for project-level assessments with defined site layouts, emission sources, and operational characteristics for sites less than five acres.

Appendix 11.10 (Air Quality Analysis/HRA) indicates that dispersion modeling AERMOD was used to evaluate onsite nitrogen oxides (NOx), carbon monoxide (CO), and particulate matter (PM10 and PM2.5) impacts during project construction and operation. However, based on the review of the AERMOD modeling, 78 receptors are included in the run. This limited receptor network is not sufficient to identify the maximum ground-level concentrations (GLCs) and may underestimate localized air quality impacts from the project.

Under South Coast AQMD's Air Quality Modeling Guidance,⁵ when AERMOD is used to assess criteria pollutant impacts:

- A uniform Cartesian receptor grid with spacing of 100 meters or less must be used for all distances within 1 kilometer of the source
- Discrete receptors must be placed along the ambient air boundary (e.g., property or fenceline boundary) following maximum spacing requirements
- Receptor placement must be sufficient to capture maximum concentration gradients and potential impacts to surrounding sensitive receptors

In addition, the modeled GLCs must be combined with appropriate background concentrations and compared to the applicable Ambient Air Quality Standards (AAQS) to determine whether the project would exceed the AAQS.

Therefore, to ensure the analysis complies with South Coast AQMD modeling guidance and CEQA requirements, the Lead Agency is recommended to revise the EIR to:

- Follow the South Coast AQMD's Modeling Guidance for receptor placement and grid spacing
- Expand and justify the receptor network to ensure the maximum GLCs are captured
- Incorporate background concentrations and compare total concentrations to the applicable AAQS
- Present full dispersion results for all receptor locations
- Disclose the revision in the Final EIR with supporting evidence

⁵ South Coast AQMD Modeling Guidance for AERMOD: <https://www.aqmd.gov/home/air-quality/meteorological-data/modeling-guidance#Receptor>

Inconsistent Information Regarding Soil Import During Construction

Section 3.3 (Phasing and Construction) of the Draft EIR states that implementation of the Proposed Project would require the import of approximately 1,000,000 cubic yards of soil.⁶ However, Appendix 11.10 (Air Quality Analysis/HRA) indicates that grading activities do not include the import of soil,⁷ which is inconsistent with the project description presented in the Draft EIR. In addition, the California Emissions Estimator Model (CalEEMod) files do not appear to account for soil import activities or the associated haul truck emissions.

To ensure that the air quality analysis is based on an accurate and consistent project description, the Lead Agency is recommended to revise the Draft EIR and supporting technical appendices to: 1) clarify and reconcile the project description by consistently identifying whether the Proposed Project requires the import of approximately 1,000,000 cubic yards of soil, and 2) revise the air quality analysis, as appropriate, to evaluate construction emissions associated with soil import activities, determine whether the revised emissions would result in significant air quality impacts, and identify and incorporate additional feasible mitigation measures, as necessary, to reduce construction-related air quality impacts to the maximum extent feasible. The revised analysis, supporting technical documentation, and CalEEMod modeling files should be included in the Final EIR and supported by substantial evidence

Completion of the Overlapped Air Quality Impact Analysis

Appendix 11.10 (Air Quality Analysis/HRA) states that, based on the assumed construction and buildout schedule of the Proposed Project, construction and operational activities may overlap. The appendix indicates that daily emissions associated with these overlapping activities were quantified; however, an evaluation of the significance of the overlapping emissions is not provided.⁸ However, the overlapping analysis is not completed.

Although South Coast AQMD has not established a separate threshold of significance for overlapping construction and operational emissions, a standard practice is to compare the combined daily emissions from overlapping activities against the applicable operational thresholds of significance to evaluate potential impacts. Therefore, the Lead Agency is recommended to complete the overlapping emissions analysis by comparing the combined daily emissions to the South Coast AQMD operational thresholds of significance, determine the resulting impact significance, identify any additional feasible mitigation measures necessary to reduce significant impacts, if applicable, and incorporate the revised analysis and supporting documentation into the Final EIR.

Consistency with Assembly Bill 98 Requirements

As discussed in the Summary of Proposed Project Information section of this letter, the nearest sensitive receptors are located within approximately 100 feet north and east of the Proposed Project site. Given the proximity of these sensitive receptors, the Lead Agency is recommended to evaluate the Proposed Project's consistency with the applicable requirements and intent of Assembly Bill

⁶ Draft EIR, p. 3-23

⁷ Appendix 11.10 Air Quality Analysis/HRA, p. 48.

⁸ *Ibid.* p. 55.

(AB) 98,⁹ including any applicable setback provisions intended to reduce potential adverse air quality and public health impacts associated with logistics uses.

Among these standards is a minimum 300-foot setback between new or expanded high-cube warehouse loading bays and sensitive receptors, where applicable. This 300-foot setback reflects current State policy intended to reduce public exposure to emissions associated with warehouse loading operations and is therefore relevant to evaluating feasible design alternatives under CEQA.

Therefore, the Lead Agency is recommended to verify that the Proposed Project complies with AB 98 requirements, including any applicable setback provisions, and to clearly document the basis for its determination of consistency in the Final EIR.

Cumulative Air Quality Impacts

South Coast AQMD staff identified other existing and proposed industrial uses within approximately one to two miles of the Proposed Project site. Under CEQA, the environmental analysis should evaluate cumulative impacts resulting from the combined effects of the Proposed Project with past, present, and reasonably foreseeable future projects. This evaluation should include potential cumulative increases in ambient concentrations of criteria pollutants and toxic air contaminants.

At a minimum, the Lead Agency is recommended to provide a qualitative assessment of cumulative air toxics impacts in the Final EIR, considering the potential for overlapping emissions from the Proposed Project and other existing and reasonably foreseeable future industrial sources in the surrounding area. Where sufficient information and modeling data are available, the Lead Agency should also conduct a quantitative cumulative analysis to more comprehensively evaluate the potential for cumulative health risks and other adverse air quality impacts.

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.

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

⁹ California Legislative Information. Assembly Bill 98 available at https://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=202320240AB98

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 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 Act¹⁰
2. South Coast AQMD 2022 Air Quality Management Plan,¹¹ 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 Measures
3. United States Environmental Protection Agency (U.S. EPA): Mobile Source Pollution - Environmental Justice and Transportation.¹²

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 NO_x and 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 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 5,182,891 sf of warehouses, 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 obligation¹³. South Coast AQMD staff is

¹⁰ 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>

¹¹ 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>

¹² United States Environmental Protection Agency (U.S. EPA), Mobile Source Pollution - Environmental Justice and Transportation. Available at: <https://www.epa.gov/mobile-source-pollution>.

¹³ 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>.

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 of guidance documents and compliance and reporting tools, please visit South Coast AQMD's WAIRE Program webpage.¹⁴

South Coast AQMD Air Permits and Role as a Responsible Agency

Section 5.13 (Air Quality) of the Draft EIR assumes that the Proposed Project would include the installation of four 300-horsepower (hp) diesel-powered fire pumps under both Options A and B, and four 2,680 hp diesel-powered emergency generators under Option B. Therefore, one or more air permits from South Coast AQMD will be required. The Final EIR should include a discussion about the potentially applicable South Coast AQMD rules that may be applicable to the Proposed Project. Those rules may include, for example, Rule 201 – Permit to Construct,¹⁵ Rule 203 – Permit to Operate,¹⁶ Rule 401 – Visible Emissions,¹⁷ Rule 402 – Nuisance,¹⁸ Rule 403 – Fugitive Dust,¹⁹ Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,²⁰ Rule 1113 – Architectural Coatings,²¹ Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil,²² Regulation XIII – New Source Review,²³ Rule 1401 – New Source Review of Toxic Air Contaminants,²⁴ Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants,²⁵ 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 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 Section 15086, the Lead Agency is required to consult with South Coast AQMD.

Conclusion

As set forth in Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a) and (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 SEIR. 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 SEIR. 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.

¹⁴ South Coast AQMD WAIRE Program. Accessed at: <http://www.aqmd.gov/waire>.

¹⁵ South Coast AQMD, Rule 201 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>

¹⁶ South Coast AQMD, Rule 203 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>

¹⁷ South Coast AQMD, Rule 401 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf>

¹⁸ South Coast AQMD, Rule 402 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>

¹⁹ South Coast AQMD, Rule 403 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403>

²⁰ South Coast AQMD, Rule 1110.2 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf

²¹ South Coast AQMD, Rule 1113 is available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf>

²² South Coast AQMD, Rule 1166 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>

²³ South Coast AQMD, Regulation XIII is available at: <https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiii>

²⁴ South Coast AQMD, Rule 1401 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf>

²⁵ South Coast AQMD, Rule 1466 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf>

²⁶ South Coast AQMD, Rule 1470 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf>

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 or me at swang1@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

Sam Wang

Program Supervisor, CEQA IGR

Planning, Rule Development & Implementation

SW:DN

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