South Coast
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Notice of Preparation (NOP) of a Draft Environmental Impact Report (EIR) for the Jensen Precast Industrial Redevelopment (Proposed Project) (SCH No.: 2026071125)

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 EIR. Please transmit copy of the Draft EIR 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

The NOP states that the Proposed Project would involve development of an approximately 755,520-square-foot industrial building, including truck loading areas, automobile parking, ornamental landscaping, utility connections, and other associated site improvements. Meanwhile, an existing facility, Jensen Precast, which is also located at the Proposed Project site, is a major source of PM10 emissions due to several pieces of equipment operating pursuant to a South Coast AQMD-issued Title V permit (Facility ID 119741).[1] The South Coast AQMD records for this facility also indicate reported emissions from a wide variety of toxic air contaminants. However, the NOP does not clearly explain the relationship between the existing Jensen Precast facility and the Proposed Project, including whether the existing facility would continue to operate concurrently alongside the Proposed Project or whether it would be shut down and demolished to accommodate the proposed development. Accordingly, the Lead Agency is recommended to refine the project description to clearly explain the relationship between the Proposed Project and the existing Title V facility in the EIR and include a complete and accurate analysis of the potential emissions of criteria air pollutants, toxics and greenhouse gases from construction (including demolition and soil remediation of the existing facility, if applicable) and operation of the Proposed Project both at the project-level and cumulative level.

[1] South Coast AQMD Facility Information Detail (FIND) Database, Jensen Precast, Facility ID 119741, https://xappprod.aqmd.gov/find//facility/AQMDsearch?facilityID=119741, accessed August 26, 2026.

The Lead Agency is recommended to rely on the guidance provided in the South Coast AQMD's CEQA Air Quality Handbook and website[2] when preparing the air quality and greenhouse gas analyses. It is also recommended that the Lead Agency use the California Air Pollution Control Officers Association's California Emissions Estimator Model (CalEEMod)[3] software to quantify emissions of air pollutants from a typical land use development project.

In addition, the South Coast AQMD has adopted regional air quality significance thresholds[4] as well as localized significance thresholds (LST).[5] If the Lead Agency has not adopted its own significance thresholds, the Lead Agency is recommended to rely on South Coast AQMD's adopted thresholds for determining whether the Proposed Project's air quality and greenhouse gas impacts are significant. It is important to note that the localized analysis can be conducted by performing air dispersion modeling.

The Lead Agency should identify any potential adverse air quality and greenhouse gas impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality and greenhouse gas impacts from both construction (including demolition, if any) and operations should be calculated. 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). 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, 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.

Because the existing facility on the Project site is a precast concrete manufacturing facility, historical manufacturing activities may have involved the use and storage of admixtures, curing chemicals, mold-release agents, oils, and other chemical agents that could have resulted in releases to soil. Regardless of whether the existing facility is demolished or remains in place, the Lead Agency is recommended to evaluate the potential for soil contamination during construction of the Proposed Project. Accordingly, South Coast AQMD Rule 1166 - Volatile Organic Compound Emissions from Decontamination of Soil[6] and Rule 1466 - Control of Particulate Emissions from

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[2] 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.

[3] CalEEMod is available free of charge at: www.caleemod.com.

[4] South Coast AQMD's 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

[5] 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.

[6] South Coast AQMD Rule 1166 - Volatile Organic Compound Emissions from Decontamination of Soil, available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf

Soils with Toxic Air Contaminants,[7] may be applicable to the Proposed Project during site disturbance and construction activities.

If the Proposed Project will generate diesel emissions from long-term construction or attract diesel-fueled vehicular trips during construction and/or operation, especially if heavy-duty diesel-fueled vehicles will be used, the Lead Agency is recommended to perform a mobile source health risk assessment and include this analysis in the Draft EIR.[8]
The Proposed Project appears to include a warehouse, and the operation of warehouses generates and attracts heavy-duty diesel-fueled trucks that emit diesel particulate matter (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 is DPM emissions.[9] For this reason, the South Coast AQMD 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. According to the MATES V carcinogenic risk interactive map, the area surrounding the Proposed Project has an existing background cancer risk at greater than 544 cases in one million.[10] When the health impacts from the Proposed Project are added to the background levels of DPM from other existing sources within the project area, residents living in the communities surrounding the Proposed Project will be exposed to greater amounts of air pollution and bear a disproportionate burden of increased health risks. To minimize the impacts of DPM and other toxics from the Proposed Project and the existing facility, as applicable and to avoid exacerbating existing conditions, the EIR should identify the nearby sensitive receptors and evaluate either quantitatively or qualitatively the potential health risk impacts to them. Further, if significant impacts are identified, the EIR should include feasible mitigation measures (which are discussed later in this letter) that would reduce or eliminate the potentially significant health risks from DPM and other toxics to the surrounding community. In addition, as required by CEQA Guidelines Section 15126.6, the EIR should also include an analysis of a range of reasonable alternatives to the Proposed Project or project location that would avoid or substantially lessen the potentially significant impacts.

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, spray booths, 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 emission limits. Questions about air permit requirements should be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385.

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[7] South Coast AQMD Rule 1466 - Control of Particulate Emissions from Soils with Toxic Air Contaminants, available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf

[8] 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.

[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, available at: MATES Data Visualization (arcgis.com).

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 EIR 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 power 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 EIR.

Mitigation Measures

In the event that the Proposed Project results in significant adverse air quality and GHG emission impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize, prevent or eliminate these impacts. Any impacts resulting from mitigation measures must also be analyzed. Several resources are available for assistance with identifying potential mitigation measures for the Proposed Project including but not limited to the general principles found in the South Coast AQMD CEQA Air Quality Handbook,[11] and more specifically and recently in the Mitigation Monitoring and Reporting Plan for the South Coast AQMD 2022 Air Quality Management Plan.[12]

The Lead Agency should consider including the following feasible mitigation measures to address potentially significant operational air quality impacts from mobile sources:

- Require: a) 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), if and when feasible; and b) a phase-in schedule to incentivize the use of these cleaner operating trucks.

  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[13] and the Heavy-Duty Low NOx Omnibus Regulation[14], ZE and NZE trucks will become increasingly more available to use. South Coast AQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency.

[11] South Coast AQMD, CEQA Air Quality Handbook, Available at: https://www.aqmd.gov/home/rules-compliance/ceqa/airquality-analysis-handboolk

[12] South Coast AQMD, 2022 Air Quality Management Plan, Chapter 4 - Control Strategy and Implementation, Available at: http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan

[13] CARB, June 25, 2020, Advanced Clean Trucks Rule, available at: https://ww2.arb.ca.gov/our-work/programs/advanced-clean-trucks.

[14] CARB has recently passed a variety of new regulations that require new, cleaner heavy-duty truck technology to be sold and used in state. For example, on August 27, 2020, CARB approved the Heavy-Duty Low NOx Omnibus Regulation, which will require all trucks to meet the adopted emission standard of 0.05 grams per brake horsepower-hour (g/hp-hr) starting with engine model year 2024. Available at: https://ww2.arb.ca.gov/rulemaking/2020/hdomnibuslownox.

- At a minimum, require the use of 2010 model year[15] 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 conduct regular inspections to the maximum extent feasible to ensure compliance.
- 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 should also consider including the following feasible mitigation measures to address potentially significant operational air quality impacts from other area sources:

- 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 water-based or low VOC cleaning products that go beyond the requirements of South Coast AQMD Rule 1113.

The Lead Agency should also consider the following design considerations for the Proposed Project as a way to further reduce air quality and health risk impacts:

- 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.

[15] CARB adopted the statewide Truck and Bus Regulation in 2010 which requires diesel trucks and buses that operate in California to be upgraded to reduce emissions. Specifically, newer heavier trucks and buses must meet particulate matter filter requirements beginning January 1, 2012 and 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.

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

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 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 in 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 755,520-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.[16] 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 of guidance documents and compliance and reporting tools, please visit South Coast AQMD's WAIRE Program webpage.[17]

Rule 1405 – Control of Ethylene Oxide Emissions from Sterilization and Related Operations

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. For these reasons, the Lead Agency is recommended to notify the project proponent, including the potential future tenants, if

[16] South Coast AQM,D Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program, available at: http://www.aqmd.gov/docs/default-source/rule-book/reg-xxiii/r2305.pdf.

[17] South Coast AQMD, WAIRE Program, available at: http://www.aqmd.gov/waire.

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.[18] 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 fenceline 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.

Thus, if the Proposed Project includes a warehouse that will store materials that have been sterilized with EtO, the Lead Agency is recommended to conduct a health risk assessment that evaluates potential health risks from EtO emissions associated with the Proposed Project and include this information in the Draft EIR to facilitate full disclosure of potential health risk impacts.

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 Danica Nguyen, Air Quality Specialist, at dnguyen1@aqmd.gov or me at swang1@aqmd.gov.

Sincerely,

Sam Wang

Sam Wang
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Planning, Rule Development & Implementation

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[18] 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.