

SENT VIA E-MAIL:

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**Draft Environmental Impact Report (EIR) for the
Hemet Logistics West Project (Proposed Project)
(SCH No.: 2024051197)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to review the above-mentioned document. The City of Hemet 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 subdividing a 60.86-acre site and constructing four one-story industrial warehouse buildings (1,129,894 square feet total, maximum height of 51 feet 6 inches) with 793 standard parking stalls, 312 electric vehicle parking stalls, and 210 trailer parking stalls.¹ Based on a review of aerial photographs, South Coast AQMD staff found that the nearest sensitive receptor (e.g., a mobile home park) is located approximately 25 feet west of the project site.² Construction of the Proposed Project was conservatively assumed to begin in the third quarter of 2025 and last approximately 14 months.³ The Proposed Project is located at 4198 Cypress Road in Hemet.⁴

South Coast AQMD Comments

Inconsistencies in Truck Trip Generation Assumptions Between the Appendix M-Transportation and Appendix B-Air Quality Impact Analyses

The truck trip generation assumptions used in the transportation analysis are inconsistent with those used for the air quality analysis. For instance:

- The Draft EIR document⁵ and Appendix M, Transportation Impact Analysis,⁶ states that the Proposed Project would generate 89 two-axle truck trips, 114 three-axle truck trips, 168 four-axle truck trips, and 594 five-axle truck trips per day.

¹ Draft EIR. Page 12.

² *Ibid.* Page 123.

³ *Ibid.* Page 105.

⁴ *Ibid.* Page 11.

⁵ *Ibid.* Page 463 (Table 5.14-4).

- Appendix B, Air Quality Impact Analysis, and the CalEEMod model output files state that the Proposed Project would generate 59 two-axle truck trips, 57 three-axle truck trips, 56 four or more axle truck trips, and 198 five+-axle truck trips per day.⁷

The truck trip estimates are substantially different between the Transportation Impact Analysis and the Air Quality Impact Analysis/CalEEMod model, as shown in **Table 1**.

Table 1: Comparison of truck trips in Appendix M/ Draft EIR vs Appendix B / CalEEMod (Air Quality Impact Analysis)

Truck Classification	Appendix M (Transportation)	Appendix B CalEEMod (Air Quality)	Difference
Two-Axle Trucks	89	59	-30
Three-Axle Trucks	114	57	-57
Four+-Axle Trucks	168	56	-112
Five+-Axle Trucks	594	198	-396
Total Truck Trips	965	370	-595

Because heavy-duty diesel trucks typically account for the majority of operational mobile source emissions associated with warehouse projects, accurately estimating truck trip generation is critical to evaluating the Proposed Project's criteria pollutant emissions, greenhouse gas emissions, and health risk impacts. Ultimately, by using different truck trip generation assumptions in the Appendix M and the Draft EIR document than those used in Appendix B and the CalEEMod model, it is unclear whether the operational mobile source emissions analysis accurately reflects the Proposed Project's truck activity. Because truck trips are a primary input to the CalEEMod operational emissions analysis, these inconsistencies could result in an underestimation of operational emissions and therefore call into question the accuracy of the air quality analysis.

Therefore, South Coast AQMD staff recommends that: (1) Reconcile the inconsistencies in truck trip generation assumptions between Appendix M, Appendix B, and the CalEEMod model; (2) Use a single, internally consistent set of truck trip generation assumptions throughout the Draft EIR; (3) Update the CalEEMod operational mobile source emissions calculations, transportation analysis, and any other analyses that rely on truck trip generation be updated accordingly, as necessary; and (4) Include the revised analyses and results in the Final EIR.

Use of South Coast AQMD's Mass Rate Localized Significance Threshold (LST) Look-Up Table Is Inconsistent with the LST Methodology

As indicated in Table 3-2 of the South Coast AQMD LST methodology,⁸ the LST screening tables are based on specific assumptions regarding project area, emission distribution, and receptor distance, and are not applicable to projects larger than five acres. Because the Proposed

⁶ Appendix M. Page 25 (Table 4.1).

⁷ Appendix B- Air Quality Analysis. Page 55.

⁸ [Final Localized Significance Threshold Methodology](#).

Project site is 60.86 acres in size and exceeds the applicability criteria for the screening tables, reliance on the LST screening values alone may not accurately characterize localized air quality impacts.

Projects of this size - or those excluded from the methodology based on Table 3-2 - may involve different emission dispersion patterns, multiple concurrent construction activities, and varying distances between emission sources and nearby sensitive receptors. These conditions are not accounted for in the screening approach.

Therefore, consistent with South Coast AQMD LST methodology, a project-specific dispersion modeling analysis or other refined localized air quality analysis should be prepared for both construction and operational emissions to adequately evaluate potential localized impacts, and the results should be included in the Final EIR.

Evaluation of Potential Airport-Related Operations Impacts and Cumulative Air Quality Impacts

South Coast AQMD staff identified Hemet-Ryan Airport approximately close to the Proposed Project site. However, the Draft EIR doesn't clarify whether the airport in the reasonably foreseeable future will be used for any Project-related activities during construction and operation, such as the transport of cargos, personnel, equipment, materials, or other Project-related travel. If airport-related activities are anticipated, the associated emissions should be calculations and accounted for in the analysis.

CEQA also requires evaluation of cumulative impacts, including increased air quality concentrations (criteria pollutants and air toxics) from past, present, and reasonably foreseeable future projects. For the air quality cumulative impacts, at a minimum, the Final EIR should include a qualitative cumulative analysis, with consideration given to a quantitative evaluation where feasible.

Therefore, the Final EIR should address airport-related emissions, if applicable, and evaluate the associated cumulative air quality impacts consistent with CEQA.

Use of Outdated AERMET and Meteorological Data in AERMOD Modeling

Appendix B (AQ Report) of the Draft EIR indicates that AERMOD Version 24142 and AERMET data Version 9 were used. However, South Coast AQMD released a newer, approved version of the AERMOD-ready meteorological (MET) data files (Version 11) in October 2024.⁹ The updated dataset was developed using the U.S. EPA's AERMET processor Version 22112, along with the AERMINUTE Version 15272 and AERSURFACE Version 20060 preprocessors.¹⁰ AERMOD Version 24142 was released by the U.S. EPA in November 2024.¹¹

⁹ South Coast AQMD AERMOD-Ready MET Data Files available at https://www.aqmd.gov/assets/aermet/AERMET_files_And_HRA_Tool.html

¹⁰ South Coast AQMD Data for AERMOD available at <https://www.aqmd.gov/home/air-quality/meteorological-data/data-foraermod>

¹¹ U.S. EPA Air Quality Dispersion Modeling - Preferred and Recommended Models available at <https://www.epa.gov/scram/meteorological-processors-and-accessory-programs>

The use of outdated meteorological data in the Draft EIR's air quality analysis is inconsistent with the U.S. EPA's Guideline on Air Quality Models (40 CFR Part 51, Appendix W) and may have resulted in inaccurate or underestimated health risk estimates. To ensure the analysis is based on the most current South Coast AQMD-approved meteorological dataset and is consistent with applicable federal modeling guidance, the Lead Agency should update the air dispersion modeling using South Coast AQMD's Version 11 AERMOD-ready meteorological data.

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 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,¹² Rule 203 – Permit to Operate,¹³ Rule 401 – Visible Emissions,¹⁴ Rule 402 – Nuisance,¹⁵ Rule 403 – Fugitive Dust,¹⁶ Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,¹⁷ Rule 1113 – Architectural Coatings,¹⁸ Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil,¹⁹ Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants,²⁰ Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines,²¹ etc. It is important to note 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 Sections 15086, the Lead Agency is required to consult with South Coast AQMD.

Conclusion

As set forth in California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a-b), the Lead Agency shall evaluate comments from public agencies on the environmental issues and prepare a written response at least 10 days prior to certifying the Final EIR. As such, please provide South Coast AQMD written responses to all comments contained herein at least 10 days prior to the certification of the Final EIR. In addition, as provided by CEQA Guidelines Section 15088(c), if the Lead Agency's position is at variance with recommendations provided in this comment letter, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided.

¹² South Coast AQMD, Rule 201 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>

¹³ South Coast AQMD, Rule 203 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>

¹⁴ South Coast AQMD, Rule 401 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-iv/rule-401.pdf>

¹⁵ South Coast AQMD, Rule 402 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-iv/rule-402.pdf>

¹⁶ South Coast AQMD, Rule 403 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-iv/rule-403>

¹⁷ South Coast AQMD, Rule 1110.2 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf

¹⁸ South Coast AQMD, Rule 1113 is available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf>

¹⁹ South Coast AQMD, Rule 1179 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1179.pdf>

²⁰ South Coast AQMD, Rule 1466 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf>

²¹ 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 Sahar Ghadimi, Air Quality Specialist, at sghadimi@aqmd.gov or me, at SWang1@aqmd.gov should you have any questions.

Sincerely,

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Planning, Rule Development & Implementation

SW:SG

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