



# South Coast Air Quality Management District

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## **Draft Environmental Impact Report (EIR) for the Proposed Newland Simpson Road Hemet Project (Proposed Project) (SCH No. 2023120462)**

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 (Staff) has provided a brief summary of the project information and prepared the following comments.

### **South Coast AQMD Staff's Summary of Project Information in the Draft EIR**

Based on the Draft EIR, the Proposed Project consists of the construction and operation of two warehouses buildings (Building 1 and Building 2) totaling 1,192,418 square feet (sq ft) of development on 71.11 net acres of currently farmed land within the City of Hemet in Riverside County.<sup>1</sup> Building 1 will be developed as an 883,080 sq ft building on 44.22 acres and will include: 1) 838,926 sq ft of warehouse space; 2) 144 truck loading docks; and 3) the generation of 334 truck trips per day (167 trucks inbound + 167 trucks outbound).<sup>2,3,4</sup> Building 2 will be developed as a 309,338 sq ft building on 18.73 acres and will include: 1) 293,871 sq ft of warehouse space; 2) 50 truck loading docks; and 3) the generation of 118 truck trips per day (59 trucks inbound + 59 trucks outbound).<sup>5,6,7</sup>

The Proposed Project is expected to operate 24 hours/day, seven days/week, and does not anticipate cold storage facilities.<sup>8</sup> The nearest sensitive receptor, a private residence, is located approximately 930 feet southeast of the Proposed Project site (28744 Warren Road, Hemet, 92545) and the nearest off-site worker is located approximately 405 feet west.<sup>9,10</sup> Construction is anticipated to occur in one phase, commence in the 1<sup>st</sup> quarter of 2025, and be completed by the 2<sup>nd</sup> quarter of 2026 (lasting approximately 14 months).<sup>11,12</sup> The Proposed Project is located near the southeast intersection of Simpson Rd and Warren Rd.<sup>13</sup>

### **South Coast AQMD Staff's Comments**

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<sup>1</sup> Draft EIR. 3.0. Project Description. Pages 3-1 & 3-14.

<sup>2</sup> *Ibid.* 1.0 Executive Summary. Page 1-2.

<sup>3</sup> *Ibid.* Appendix D. Mobile Source Health Risk Assessment. Page 17.

<sup>4</sup> *Ibid.* Appendix N. Traffic Impact Analysis. Page 16.

<sup>5</sup> *Ibid.* 1.0 Executive Summary. Page 1-2.

<sup>6</sup> *Ibid.* Appendix D. Mobile Source Health Risk Assessment. Page 17.

<sup>7</sup> *Ibid.* Appendix N. Traffic Impact Analysis. Page 16.

<sup>8</sup> *Ibid.* 3.0 Project Description. Page 3-33.

<sup>9</sup> *Ibid.* 5.3. Air Quality. Page 5.3-17.

<sup>10</sup> *Ibid.* Appendix D. Mobile Source Health Risk Assessment. Page 2.

<sup>11</sup> *Ibid.* 3.0 Project Description. Page 3-33.

<sup>12</sup> *Ibid.* 3.0 Appendix C. Air Quality Impact Analysis. Page 41.

<sup>13</sup> *Ibid.* 1.0 Executive Summary. Page 1-1.

*Potential Underestimation of Operational Emissions Due to Inaccurate Assumptions for Truck Trip Lengths*

The Draft EIR states that in order to determine the emissions from trucks, the operational air quality impact analysis was based, in part, on the assumption that the average daily truck trip length is 39.9 miles for 4+-axle heavy-heavy-duty trucks (HHDT), 15.3 miles for 2-axle trucks (LHDT1, LHDT2), and 14.2 miles for 3-axle trucks (MHDT).<sup>14</sup> The Draft EIR then states that a weighted average trip length of 30.47 miles (based on traffic trip percentages) was used.<sup>15</sup> The Proposed Project site, however, is located approximately 90 miles away from the Ports of Long Beach and Los Angeles (Ports), which means that the air quality analysis underestimated the emissions from trucks traveling from the Ports to the Proposed Project site. For this reason, Staff recommends the Lead Agency revise the calculations in the Final EIR by taking a project-specific approach to the vehicle trip length. Tailoring these parameters and assumptions to be based on project-specific data will ensure a more accurate assessment of emissions, accounting for the unique circumstances and logistical realities of the Proposed Project.

*Use of South Coast AQMD's Mass Rate Localized Significance Threshold (LST) Look-Up Table to Analyze the Proposed Project's Localized Air Quality Impact is not Consistent with Guidance for the LST Methodology*

The Proposed Project covers approximately 71.11 net acres. Appendix C of the Draft EIR states that during construction up to 15 acres/day can be actively disturbed during grading.<sup>16</sup> The Lead Agency uses South Coast AQMD's Mass Rate LST Look-up Table for five acres as a screening tool to determine if the Proposed Project's construction and operational daily emissions of NOx, CO, PM10 and PM2.5 could result in a significant impact to local air quality.<sup>17</sup> South Coast AQMD staff, however, developed the LST methodology for proposed projects that are less than or equal to five acres.<sup>18</sup> For projects that are greater than five acres in size, Staff recommends lead agencies perform project-specific dispersion modeling to determine *operational* localized air quality impacts. For *construction*, if project sites are greater than five acres in size and disturb more than five acres/day during the construction phase, as this Proposed Project is anticipated to do during grading, Staff also recommends lead agencies perform project-specific dispersion modeling to determine *construction* localized air quality impacts. Staff therefore recommends the Lead Agency to: 1) perform project-specific air dispersion modeling for the Proposed Project's construction and operational phase emissions to determine localized air quality impacts; and 2) include the results in the Final EIR.

*Cumulative Impacts during Operation*

Table 5-1 of the Draft EIR provides a list of 24 projects that are considered in the cumulative impact analysis of the Proposed Project.<sup>19</sup> Of these 24 projects, four are described as warehouse projects (project #16, #17, #20, and #23). Staff recommends the Lead Agency add another proposed warehouse project to the list, the Hemet Logistics West Project. According to the Notice of Preparation (NOP) for the Hemet Logistics West Project, SCH No. 2024051197 (NOP comment period of 5/29/2024 through 7/12/24), the

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<sup>14</sup> Draft EIR. 5.3 Air Quality. Page 5.3-24.

<sup>15</sup> *Ibid.*

<sup>16</sup> *Ibid.* Appendix C. Air Quality Impact Analysis. Page 50.

<sup>17</sup> South Coast AQMD Appendix C – Mass Rate LST Look-up Table. Access here: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/appendix-c-mass-rate-lst-look-up-tables.pdf>

<sup>18</sup> Final LST Methodology, July 2008. Page 1-1, 3-3, & 3-4. Access here: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf>

<sup>19</sup> Draft EIR. 5.0 Environmental Impact Analysis. Page 5.5.

Hemet Logistics West Project will consist of developing four industrial buildings with a combined gross floor area of 1,101,894 sq ft. This project is proposed to be built on 60.86 acres of currently vacant and undeveloped land near the southwest intersection of West Acacia Avenue and Cawston Avenue, Hemet, CA.

Additionally, Per CEQA Guidelines Section 15065(a)(3), South Coast AQMD staff is primarily concerned with the cumulative air quality impacts from increased concentrations of air toxics in the region. Pursuant to CEQA which requires an analysis of direct, indirect, and cumulative impacts, South Coast AQMD has initiated a public process to develop additional guidance for evaluating cumulative air quality impacts from increased concentrations of air toxics for CEQA projects. As of the date on this comment letter, there have been five public working group meetings (WGMs) allocated to development of this proposed cumulative impact policy. For general information on WGMs #1 through #5 and to gain familiarity with this developing policy, please visit South Coast AQMD's webpage at [https://www.aqmd.gov/home/rules-compliance/ceqa/ceqa-policy-development-\(new\)](https://www.aqmd.gov/home/rules-compliance/ceqa/ceqa-policy-development-(new)).

Given the aforementioned, Staff recommends that, at minimum, the Lead Agency perform a qualitative analysis in order to disclose the potential cumulative impacts from air toxics in consideration by listing all surrounding past, present, and probable future projects. The Lead Agency may also perform a more detailed and robust quantitative analysis of cumulative air toxics and its potential health risk implications and include such an analysis in the Final EIR.

*Truck Idling Diesel Particulate Matter (DPM) Emissions and Building Downwash Option in Operational Phase Health Risk Assessment (HRA)*

Staff reviewed the operational phase HRA air quality modeling files that the Lead Agency provided and notes that the building downwash effect was modeled for a 238-horsepower diesel fire pump's DPM emissions.<sup>20</sup> Staff also notes that the building downwash effect was not modeled for truck idling DPM emissions. By not modeling the building downwash effect for the trucking idling DPM emissions, the dispersion model results in an underestimation of ground-level pollutant concentrations near the building. The effects of building downwash can cause maximum ground level concentrations to more than double.<sup>21</sup> To model the building downwash effect of truck idling DPM emissions, the truck idling emissions must first be classified in AERMOD as a *point* source-type. As stated in South Coast AQMD Risk Assessment Procedures for Rules 1401, 1401.1 and 212, the algorithms used in building downwash only affect *point* source types and do not affect *volume* source types.<sup>22</sup> The Proposed Project's operational HRA modeling file show that the truck idling DPM emissions have been classified as *line volume* source types. Staff therefore recommends: 1) truck idling DPM emissions be modeled as *point* source types; 2) include building downwash effect on such DPM emissions in the model; and 3) include the updated HRA results and air quality analysis in the Final EIR.

*Additional Recommended Air Quality and Greenhouse Gases (GHG) Project Design Considerations and Mitigation Measures*

In the event that any of the above recommendations for the Proposed Project result 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 or eliminate any such impacts. Staff also notes that the Proposed Project's land use amendment to the City of Hemet General Plan results in the Proposed Project being located

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<sup>20</sup> Email communication with Monique Alaniz-Flejter and Meaghan Truman on technical data request, June 5, 2024).

<sup>21</sup> South Coast AQMD Risk Assessment Procedures for Rules 1401, 1401.1 & 212. Page X-2 through X-4. Access here: <https://www.aqmd.gov/docs/default-source/permitting/rule-1401-risk-assessment/riskassessproc-v8-1.pdf>

<sup>22</sup> *Ibid.*

adjacent to land parcels designated as Mixed Use (MU) land uses -with the MU designation intended for commercial, residential, and recreational uses- as well as other residential land use types (see Figure 1 below).<sup>23,24</sup> Currently much of the land parcels adjacent to the Proposed Project site are utilized for farming activities (see Figure 2 below). South Coast AQMD is concerned about the potential public health impacts of siting new sensitive populations within proximity of existing air pollution sources (DPM emissions from Proposed Project). For the above reasons, prior to approving this Proposed Project, the Lead Agency is recommended to consider additional project design features (PDFs) and/or mitigation measures to further reduce the Proposed Project’s air quality and GHG impacts. Staff recommends incorporating the following PDFs and mitigation measures into the Final EIR:

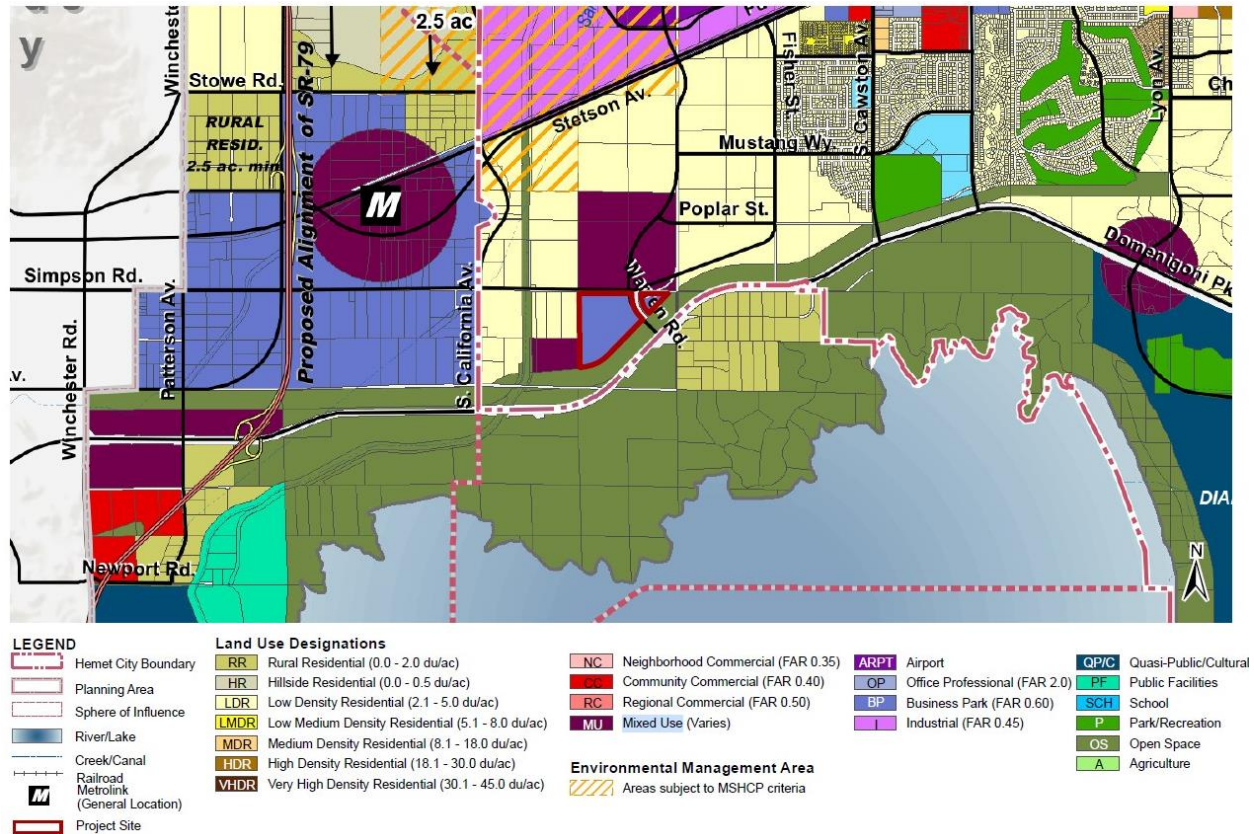


Figure 1. Screenshot of Draft EIR, Proposed General Plan Land Use Map, Page 3-19

<sup>23</sup> Draft EIR. 3.0 Project Description. Page 3-13.

<sup>24</sup> *Ibid.* 1.0 Executive Summary. Page 1-3.



**Figure 2. Screenshot of Draft EIR, Aerial view of Proposed Project site, Page 3-7**

PDFs and Mitigation Measures for Construction and Operational Air Quality Impacts from Mobile Sources

1. Require zero-emissions (ZE) or near-zero emission (NZE) on-road haul trucks, such as heavy-duty trucks with natural gas engines that meet the California Air Resources Board's (CARB) 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 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 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.
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. Where appropriate, 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.

#### PDFs and Mitigation Measures for 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.

#### Design Considerations for Reducing Air Quality and Health Risk Impacts

1. 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.
2. Design the Proposed Project such that any truck check-in point is inside the Proposed Project site to ensure no trucks are queuing outside.
3. Design the Proposed Project to ensure that truck traffic inside the Proposed Project site is as far away as feasible from sensitive receptors.
4. Restrict overnight truck parking in sensitive land uses by providing sufficient overnight truck parking inside the Proposed Project site.

Lastly, 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<sup>25</sup>
2. South Coast AQMD 2022 Air Quality Management Plan,<sup>26</sup> 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 Measure
3. United States Environmental Protection Agency (U.S. EPA): Mobile Source Pollution - Environmental Justice and Transportation<sup>27</sup>

### *South Coast AQMD Air Permits and Role as a Responsible Agency*

The Draft EIR states that the Proposed Project is required to obtain a permit from South Coast AQMD for the anticipated 238-horsepower fire pump.<sup>28,29</sup> 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., air permits from South Coast AQMD will be required and 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. 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 Final 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.

The Final EIR should also include calculations and analyses for construction and operation emissions for the new stationary and portable sources, as this information will also 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: <http://www.aqmd.gov/home/permits>.

### 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

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<sup>25</sup> 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/sites/all/files/agweb/pdfs/environment/warehouse-best-practices.pdf>

<sup>26</sup> South Coast AQMD, 2022 Air Quality Management Plan. Available at: <http://www.aqmd.gov/home/air-quality/air-quality-management-plans/air-quality-mgt-plan>

<sup>27</sup> US.EPA. Mobile Source Pollution - Environmental Justice and Transportation. Available at: <https://www.epa.gov/mobile-source-pollution/environmental-justice-and-transportation>

<sup>28</sup> Draft EIR. 1.0 Executive Summary. Page 1-7.

<sup>29</sup> *Ibid.* 3.0 Project Description. Page 3-36.

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 is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Evelyn Aguilar, Air Quality Specialist, at [eaguilar@aqmd.gov](mailto:eaguilar@aqmd.gov) should you have any questions.

Sincerely,

*Sam Wang*

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