



South Coast Air Quality Management District

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**Recirculated Draft Environmental Impact Report (Recirculated DEIR) for the Proposed
Stoneridge Commerce Center Project (Proposed Project)
(SCH No.: 2020040325)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The Riverside County 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 organized by topic of concern.

South Coast AQMD Staff's Summary of Project Information in the Recirculated DEIR

Based on the Recirculated DEIR, the Lead Agency proposes to develop a vacant and undeveloped 582.6-acre site within the community of unincorporated Riverside County.¹ The Recirculated Draft EIR includes two land use plans: the Primary Land Use Plan (preferred) and the Alternative Land Use Plan.² Under the Primary Land Use Plan, the Proposed Project would be developed with up to 388.5 acres of light industrial (LI) land uses, 49.1 acres of business park (BP) land uses, 8.0 acres of commercial retail land uses, 18.1 acres of open space (OS)– conservation, 81.6 acres of OS – conservation habitat, and 37.3 acres of major roadways.³ Under the Alternative Land Use Plan, the Proposed Project would be developed with up to 388.5 acres of LI land uses, 51.5 acres of BP land uses, 8.5 acres of commercial retail land uses, 18.1 acres of OS– conservation, 81.6 acres of OS – conservation habitat, and 34.4 acres of major roadways.⁴ The Proposed Project is assumed to consist of approximately 40% cold storage, 40% high-cube fulfillment center uses, 10% warehouse, and 10% manufacturing under the LI building area.⁵ The BI building area is assumed to consist of approximately.⁶ Based on a review of aerial photographs, South Coast AQMD staff found that the nearest sensitive receptor (e.g., residential uses) is approximately 2,500 feet south-southeast of the Proposed Project site. Construction of the Proposed Project is anticipated to occur from July 2023 to November 2031.⁷

¹ Recirculated DEIR. Page 3-1.

² *Ibid.* Page 3-2.

³ *Ibid.*

⁴ *Ibid.*

⁵ *Ibid.* Page 3-10.

⁶ *Ibid.*

⁷ *Ibid.* Page 3-26.

South Coast AQMD Staff's Comments on the Recirculated DEIR*Import and/or Export Information During Construction*

The Proposed Project's construction activities include site preparation, grading, building construction, paving, and architectural coating.⁸ The Recirculated DEIR mentions that the grading activities would require no import or export of earthwork materials.⁹ However, Appendix B1 – Air Quality Impact Analysis mentions that the Proposed Project would require approximately 68,877 cubic yards of soil import.¹⁰ In the event that the Proposed Project imports soil during construction, hauling trucks are required in order to deliver soil to the site. Thus, the air quality analysis during construction is potentially underestimated in the Recirculated DEIR. It is essential to include all the emission sources in the air quality analysis to determine the significance level during construction and propose all the feasible mitigation measures to reduce or minimize the impacts. In addition, the information and assumptions should be consistent throughout the CEQA document and its appendices.

Potential Underestimation of Emissions Due to Imprecise Assumptions for Truck Trip Lengths in Emissions Analysis

The Recirculated DEIR states, "...To determine emissions from trucks for the proposed industrial uses, the analysis incorporates the SCAQMD recommended truck trip length of 15.3 miles for 2-axle (LHDT1, LHDT2), 14.2 miles for 3-axle (MHDT) trucks, and 39.9 miles for 4+-axle (HHDT) trucks and" This resulted in the analysis assuming a truck trip length of 30.51 miles for the industrial uses with an assumption of 100% primary trips.¹¹ The referenced truck trip lengths of 14.2 miles and 39.9 miles were originally derived from the Southern California Association of Government's (SCAG) estimation of average truck trip length in its 2016 Regional Transportation Plan modeling analysis.^{12,13}

However, the Proposed Project site is located approximately 80 to 90 miles one-way from the Ports of Los Angeles and Long Beach (based on the aerial photograph review), which indicates that the assumed truck trip lengths were inaccurate and, in turn, causing the air quality analysis to have underestimated the emissions from trucks traveling from the Ports to the Proposed Project site. Thus, the analysis in the Recirculated Draft EIR should be revised by applying the actual or more conservative vehicle trip length and trip rates, such as designating 40 miles for local trips and 90 miles for Port-related trips. Tailoring these parameters and assumptions to project-specific data will ensure a more accurate assessment of emissions, accounting for the unique circumstances and logistical realities of the Proposed Project.

California Emissions Estimator Model (CalEEMod) Analysis

In the operational CalEEMod output files for the Primary Land Use Plan and the Alternative Land Use Plan scenarios, adjacent to the "unrefrigerated warehouse-no rail, refrigerate warehouse-no rail" land use subtypes, "user-defined industrial" is added.¹⁴ According to the CalEEMod User Guide, the "user-

⁸ *Ibid.* Table 3-3. Page 3-27.

⁹ *Ibid.* Page 3-21.

¹⁰ Appendix B1 – Air Quality Impact Analysis. Page 45.

¹¹ *Ibid.* Page 4.3-40.

¹² South Coast AQMD, Second Draft Staff Report. Proposed Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program and Proposed Rule 316 – Fees for Rule 2305. Available at: https://www.aqmd.gov/docs/default-source/planning/fbmsm-docs/pr-2305_sr_2nd-draft_4-7-21_clean.pdf.

¹³ Southern California Association of Government (SCAG).

Available at: https://scag.ca.gov/sites/main/files/file-attachments/validationsummaryreport_20rtp_final_2020_05.pdf.

¹⁴ Appendix B1. CalEEMod Output Files.

defined” may be selected to characterize project land use subtypes that are not included in CalEEMod. If selected, all information on the Land Use screen will need to be input manually to support emissions quantification.¹⁵ However, the lot acreage and the floor square area use are all set to zero under the “user-defined industrial” land use subtype.

In addition, the truck information (e.g., truck trips) is entered for the “user-defined industrial” land use subtype but not for the “unrefrigerated warehouse-no rail and refrigerated warehouse-no rail” land use subtypes for the Proposed Project. This inconsistency suggests that the heavy-duty truck emissions for warehouse activities were underestimated since no data is entered for the “user-defined industrial” land use subtype. Therefore, it is recommended that the Recirculated Final EIR revise the analysis to correct this inconsistency and/or provide an explanation as to why the land use is separated in the CalEEMod analysis and why no truck information is allocated to the “unrefrigerated warehouse-no rail and refrigerated warehouse-no rail” land use subtypes.

Underestimation of Ground-Level Pollutants Near Buildings in Health Risk Assessment (HRA)

South Coast AQMD staff’s review of the operational HRA modeling files noted that industrial buildings were not included in the building downwash option in the AERMOD dispersion model during operation, which resulted in an underestimation of the ground-level pollutant concentrations near the buildings. Including the industrial buildings in the building downwash option is essential to analyze ground-level concentrations more accurately.

Additional Air Quality Mitigation Measures for NOx and PM Emissions from Construction

Given the long-range plan of the Proposed Project’s construction from July 2023 to November 2031, Tier 4 technology may not be the cleanest technology when construction occurs in the later years. According to the CARB Strategies for Reducing Emissions from Off-Road Construction Equipment, the implementation of off-road Tier 5 starting in 2027 or 2028 and the Governor’s Executive Order in September 2020 requires CARB to develop and propose a full transition to Zero Emissions (ZE) by 2035.¹⁶ Considering the scope of the project, it is crucial to ensure that the levels of construction emissions, specifically NOx and PM₁₀, remain less than the significance thresholds during the construction period for each proposed individual project. Moving towards achieving this goal, when feasible, involves opting for electric emission-free engines instead of diesel-fueled engines for construction equipment. This proactive choice not only aligns with environmental concerns but also demonstrates a commitment to minimizing the Proposed Project’s environmental footprint. The abatement of NOx can also be pursued by enforcing greener construction activities, such as limiting the usage of older, dirtier engines in favor of adopting the latest available technologies or even incorporating exhaust retrofits, such as cutting-edge exhaust after-treatment techniques.

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

¹⁵ California Emissions Estimator Model (CalEEMod) Version 2022.1 User Guide. Access at: https://www.caleemod.com/documents/user-guide/CalEEMod_User_Guide_v2022.1.pdf

¹⁶ CARB. Going Zero. Available at: <https://ww2.arb.ca.gov/going-zero>

Project's air quality impacts, South Coast AQMD recommends incorporating the following mitigation measures and project design considerations into the Recirculated Final EIR.

Mitigation Measures for 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 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 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. At a minimum, require the use of a 2010 model year that meets 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. All heavy-duty haul trucks should meet CARB's lowest optional low-NOx standard starting in 2022. 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. Include the requirements 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. Regular inspections should be conducted by the Lead Agency to the maximum extent feasible to ensure compliance.
4. 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.
5. 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.

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.
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 Recirculated Final EIR:

1. State of California – Department of Justice: Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act¹⁷
2. South Coast AQMD 2022 Air Quality Management Plan,¹⁸ 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 Transportation¹⁹

South Coast AQMD Air Permits and Role as a Responsible Agency

If the 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. In addition, CEQA Guidelines Section 15096 sets

¹⁷ 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>

¹⁸ 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>

¹⁹ US.EPA. Mobile Source Pollution - Environmental Justice and Transportation. Available at: <https://www.epa.gov/mobile-source-pollution/environmental-justice-and-transportation>

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 Recirculated 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 Recirculated 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 environmental issues and prepare a written response at least 10 days prior to certifying the Recirculated 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 Recirculated 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 Danica Nguyen, Air Quality Specialist, at dnguyen1@aqmd.gov should you have any questions.

Sincerely,

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Planning, Rule Development & Implementation

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