



# South Coast Air Quality Management District

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SENT VIA E-MAIL:

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**Notice of Availability of a Draft Environmental Impact Report for the  
Cajalco Commerce Center Project– Foundation General Plan Amendment  
No.240005, Change of Zone No. 2200062, Plot Plan No. 220050, and  
Tentative Parcel Map No. 38601 (SCH No. 2023060799)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to review the above-mentioned document. The County of Riverside 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.

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

Based on the Draft EIR, the Proposed Project consists of constructing a 1,003,510-square-foot warehouse on 44.66 acres and a public park on 13.33 acres.<sup>1</sup> Based on a review of aerial photographs, South Coast AQMD staff found that the nearest sensitive receptor (e.g., existing residence) is 76 ft east of the project site.<sup>2</sup> The proposed warehouse is located north of Rider Street, east of Decker Road, south of Cajalco Road, and west of Seaton Avenue. The proposed public park is located east and west of Decker Road, approximately 185 feet south of the warehouse building. The 64.97 acres project site and 21.82 acres of off-site Project-related disturbance areas are located within the western region of unincorporated Riverside County within the Mead Valley Area Plan (MVAP). Construction will commence in September 2024 and last through December 2025.<sup>3</sup>

South Coast AQMD Staff's Comments

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

Appendix C1 - Air Quality Report explains that air quality impact analysis was based on the assumption that the average truck trip length is 35.88 miles for high cube fulfillment. However, the project site is located approximately 67 miles away from the Ports of Long Beach and Port of Los Angeles, which suggests that the air quality analysis underestimated the emissions from

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<sup>1</sup> Appendix C1, Air Quality Analysis. Page 17.

<sup>2</sup> *Ibid.* Page 65.

<sup>3</sup> *Ibid.* Page 17.

trucks traveling from the Ports to the project site. For this reason, the Lead Agency is recommended to revise the calculations in the Final EIR by applying reasonable and conservative trip lengths, such as designating 35 miles for local trips and 67 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.

Additionally, according to Appendix C1, Air Quality Analysis, the Proposed Project would generate 57 two-way truck trips (daily number of trucks) for the 150.526 sf of high-cube cold storage during operations (all the trucks that are associated to include TRUs). However, in the Appendix N1, Traffic analysis document, the daily truck trips associated with the high-cube cold storage is 114 truck trips per day, which is higher the truck trips mentioned in the Appendix C1. Therefore, Staff recommends that the Lead Agency revise the number of truck trips and update the calculations accordingly to ensure the correct information is presented in the Final EIR and appendices.

*Addressing Potential Underestimations of Diesel Exhaust Exposure in TRU Operations and Emergency Generator Use*

Based on South Coast AQMD's review, the AERMOD modeling files provided in Appendix C2 - HRA Report assumes a duration of 30 minutes for on-site TRU truck idling at the Proposed Project site. However, according to the California Air Resource Board (CARB)'s Proposed Amendments to the Airborne Toxic Control Measure (ATCM) for In-Use Diesel-Fueled TRUs, a TRU-equipped vehicle enters the facility fully loaded (inbound) and exits the facility fully loaded (outbound), with each loading and unloading process taking 2 hours—totaling 4 hours. By assuming a 30-minute TRU idling duration, the Lead Agency may have underestimated the potential exposure of nearby residents to diesel exhaust emissions, which could pose a significant cancer risk to the community. Therefore, South Coast AQMD staff recommends that the Lead Agency either include a project design feature in the DEIR to limit TRU idling time to less than 30 minutes at the Project site or revise the Project's HRA to reflect a reasonable TRU idling duration supported by substantial evidence.

Additionally, the project description indicates that a emergency diesel generator will be utilized on-site. It is recommended that the Lead Agency include this emergency diesel generator as an emission source in the AERMOD and HRA modeling files to ensure an accurate estimation of the cancer risk (CR) imposed on the surrounding communities to avoid any potential underestimation.

*Assessing the Impact of Air Quality on Sensitive Receptors: Considerations for Public Parks Adjacent to Distribution Centers*

Sensitive receptors are people with an increased sensitivity to air pollution or environmental contaminants, including schools, daycare centers, nursing homes, elderly care facilities, hospitals, residential dwelling units. The Proposed Project includes a public park that is planned to be located adjacent to the proposed warehouse in the southern part of the Proposed Project site. According to the California Air Resources Board's (CARB) Air Quality and Land Use Handbook, it is recommended to avoid placing new sensitive land uses within 1,000 feet of a

distribution center that accommodates more than 40 trucks with TRUs per day.<sup>4</sup> Therefore, it is recommend the Lead Agency to consider the above reference guide through the land use decision-making process to reduce air pollution exposure and avoid incompatible land use issue.

*Re-evaluation of Daily Truck Trips to Ensure Accurate Emission Estimates for Soil Export during Project Construction*

According to Appendix C1, Air Quality Analysis, the Proposed Project plans to export 218,100 cubic yards (CY) of soil, with an assumption of 200 truck trips per day for hauling during project construction. However, the CalEEMod user guide indicates trucks can haul 16 CY of material per load.<sup>5</sup> Based on the project description, the number of workdays per phase would be 63. Therefore, the calculated truck trips for hauling should be 216 per day, rather than the 200 currently estimated. To avoid underestimating truck emissions, it is recommended that the Lead Agency correct the daily truck trip calculation for hauling during project construction.

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

Based on Appendix C1, Air Quality Analysis, the CalEEMod input files indicate that Tier 3 engines are used for some construction equipment. While Tier 3 technology is effective, Tier 4 represents the cleanest option available. Moreover, moving towards electric emission-free engines instead of diesel-fueled ones would further reduce the project's construction emissions, specifically PM<sub>10</sub> and NOx emissions. This proactive choice aligns with environmental concerns and demonstrates a commitment to minimizing the project's environmental footprints. Additionally, several other resources to assist the Lead Agency with identifying additional potential mitigation measures for the Proposed Project are included in the South Coast AQMD's CEQA Air Quality Handbook<sup>6</sup> for operational and construction emissions.

*Additional Mitigation Measures for Operational Air Quality Impacts*

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 Trucks Rule and the Heavy-duty Low NOx Omnibus Regulation, ZE and NZE trucks will become increasingly more available to use.

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<sup>4</sup> [ARB's Community Health: 2005-04-00 ARB's Air Quality and Landuse Handbook: A Community Health Perspective \(aqmd.gov\)](#)

<sup>5</sup> [https://www.caleemod.com/documents/user-guide/CalEEMod\\_User\\_Guide\\_v2022.1.pdf](https://www.caleemod.com/documents/user-guide/CalEEMod_User_Guide_v2022.1.pdf)

<sup>6</sup> <https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>

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 Act<sup>7</sup>
2. South Coast AQMD 2022 Air Quality Management Plan,<sup>8</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>9</sup>

### *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., air permits from South Coast AQMD will be required. The final CEQA document, whether a MND or EIR, should include a discussion about the potentially applicable rules that the Proposed Project needs to comply with. Those rules may include, for example, Rule 201 – Permit to Construct, Rule 203 – Permit to Operate,<sup>10</sup> Rule 401 – Visible Emissions,<sup>11</sup> Rule 402 – Nuisance,<sup>12</sup> Rule 403 – Fugitive Dust,<sup>13</sup> Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,<sup>14</sup> Rule 1113 – Architectural Coating,<sup>15</sup> Rule 1166 – VOC Contaminated Soil Excavation,<sup>16</sup> Rule 1179 – Publicly Owned Treatment Works Operation,<sup>17</sup> Regulation XIII – New Source Review,<sup>18</sup> Rule 1401 – Air Toxics,<sup>19</sup> Rule 1466 – Control of Particulate Emissions

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<sup>7</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/system/files/media/warehouse-best-practices.pdf>

<sup>8</sup> 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>

<sup>9</sup> United States Environmental Protection Agency (U.S. EPA), Mobile Source Pollution - Environmental Justice and Transportation. Available at: <https://www.epa.gov/mobile-source-pollution/environmental-justice-and-transportation>

<sup>10</sup> South Coast AQMD. Rule 203 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>

<sup>11</sup> South Coast AQMD. Rule 401 available at <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf>

<sup>12</sup> South Coast AQMD. Rule 402 available at <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>

<sup>13</sup> South Coast AQMD. Rule 403 available at <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403>

<sup>14</sup> South Coast AQMD. Rule 1110.2 available at [https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110\\_2.pdf](https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf)

<sup>15</sup> South Coast AQMD. Rule 1113 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf>

<sup>16</sup> South Coast AQMD. Rule 1166 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>

<sup>17</sup> South Coast AQMD. Rule 1179 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1179.pdf>

<sup>18</sup> South Coast AQMD. Regulation XIII available at <https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiii>

<sup>19</sup> South Coast AQMD. Rule 1401 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf>

from Soils with Toxic Air Contaminants,<sup>20</sup> Rule 1470 – Requirements for Stationary Diesel Fueled Internal Combustion and Other Compression Ignition Engines,<sup>21</sup> etc. It is important to note that when 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.

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 the process for conducting a review of the Proposed Project and issuing discretionary approvals. Moreover, it is important to note that if a Responsible Agency determines that a CEQA document is not adequate to rely upon for its discretionary approvals, the Responsible Agency must take further actions listed in CEQA Guideline Section 15096(e), which could have the effect of delaying the implementation of the Proposed Project. In its role as CEQA Responsible Agency, the South Coast AQMD is obligated to ensure that the CEQA document prepared for this Proposed Project contains a sufficient project description and analysis to be relied upon in order to issue any discretionary approvals that may be needed for air permits. South Coast AQMD is concerned that the project description and analysis in its current form in the MND is inadequate to be relied upon for this purpose.

For these reasons, the final CEQA document should be revised to include a discussion about any and all new stationary and portable equipment requiring South Coast AQMD air permits, provide the evaluation of their air quality and greenhouse gas impacts, and identify South Coast AQMD as a Responsible Agency for the Proposed Project as this information will 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 <https://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 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.

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

<sup>21</sup> South Coast AQMD. Rule 1470 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 is 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](mailto:sghadimi@aqmd.gov) should you have any questions.

Sincerely,

*Sam Wang*

Sam Wang

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