



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:

bcleary@cityofmenifee.us

Brandon Clearly, Associate Planner
City of Menifee, Community Development Department
29844 Haun Road
Menifee, CA 92586

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Draft Environmental Impact Report (EIR) for the Proposed Northern Gateway Logistics Center Project (Proposed Project) (SCH No. 2021110379)

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to review the above-mentioned document. The City of Menifee 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 construction and operation of two warehouse buildings (Building 1 and Building 2) totaling 398,252 square feet (sq ft) of total building area on approximately 20.17 acres of undeveloped land within the City of Menifee in Riverside County.¹ Building 1 will be developed as a 105,537 sq ft building and will include 99,537 sq ft of warehouse space and 15 truck loading docks.² Building 2 will be developed as a 292,715 sq ft building and will include 277,715 sq ft of warehouse space and 37 truck loading docks.³ Both warehouse buildings combined will generate 184 truck trips per day (92 trucks inbound + 92 trucks outbound).⁴

The Proposed Project will not include cold storage facilities.⁵ The air quality analysis contained in the Draft EIR, therefore, does not take into account emissions from transport refrigeration units (TRUs) and the analysis models the Proposed Project as unrefrigerated.⁶ The nearest sensitive receptors, a residential development, are located approximately 350 feet south of the Proposed Project site and the nearest off-site worker is located approximately 688 feet northwest (Sergio Gonzalez Training Center).^{7, 8} Construction is anticipated to occur in one phase, commence in the 4th quarter of 2024, and be completed by the 4th quarter of 2025 (lasting approximately 12 months).^{9,10} The Proposed Project is located near the southeast intersection of Ethanac Rd and Evans Rd.¹¹

South Coast AQMD Staff's Comments

¹ Draft EIR. 2.0. Project Description. Pages 2-1 through 2-3.

² *Ibid.* 2.0 Project Description. Page 2-3.

³ *Ibid.* 2.0 Project Description. Page 2-3.

⁴ *Ibid.* 4.13 Transportation. Page 4.13-11.

⁵ *Ibid.* 2.0 Project Description. Page 2-3.

⁶ *Ibid.* 4.2 Air Quality. Page 4.2-19.

⁷ *Ibid.* 4.2 Air Quality. Page 4.2-16.

⁸ *Ibid.* 4.2 Air Quality. Page 4.2-34.

⁹ *Ibid.* 2.0 Project Description. Page 2-4.

¹⁰ *Ibid.* Appendix B1. Air Quality Assessment. Page 20.

¹¹ *Ibid.* 2.0 Project Description, Exhibit 2-2 Local Vicinity Map. Page 2-7.

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 modeled on the assumption that the average daily truck trip length is 33.2 miles.¹² The Proposed Project site, however, is located approximately 88 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 this parameter so that it is 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 20.17 acres. 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 operational daily emissions of NOx, CO, PM10 and PM2.5 could result in a significant impact to local air quality.^{13,14} South Coast AQMD staff, however, developed the LST methodology for proposed projects that are less than or equal to five acres.¹⁵ 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. Staff therefore recommends the Lead Agency: 1) perform project-specific air dispersion modeling for the Proposed Project's operational phase emissions to determine localized air quality impacts; and 2) include the results in the Final EIR.

Additionally, the Draft EIR states that during construction up to a maximum of 3.5 acres per day may be actively disturbed (see Table 1 below).¹⁶ The Lead Agency then uses South Coast AQMD's Mass Rate LST Look-up Table (adjusted for 3.5 acres) as a screening tool to determine if the Proposed Project's daily construction emissions of NOx, CO, PM10 and PM2.5 could result in a significant impact to local air quality.^{17,18} Staff, however, found that during construction up to a maximum of 4 acres per day may be disturbed during grading.¹⁹ Staff therefore recommends the Lead Agency: 1) recalculate the maximum acres graded per day during construction; 2) update the LST thresholds accordingly; and 3) include the updated results in the Final EIR.

¹² Draft EIR. 4.2 Air Quality. Page 4.2-19.

¹³ *Ibid.* Page 4.2-28.

¹⁴ 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>

¹⁵ 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>

¹⁶ Draft EIR. 4.2 Air Quality. Page 4.2-27.

¹⁷ *Ibid.*

¹⁸ 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>

¹⁹ Draft EIR. Appendix B1. Air Quality Assessment. Page 68 of 85 of CalEEMod output file.

Table 1. Equipment-Specific Grading Rates

Construction Phase	Equipment Type	Equipment Quantity	Acres Graded per 8-Hour Day	Operating Hours per Day	Acres Graded per Day
	Tractors	4	0.5	8	2.0
Site Preparation	Graders	0	0.5	8	0
	Dozers	3	0.5	8	1.5
	Scrapers	0	1	8	0
	Total Acres Graded per Day				3.5

Table 2. South Coast AQMD Staff’s Calculation of Maximum Acres Disturbed per Day During Construction

Construction Phase	Equipment Type	Equipment Quantity	Acres Graded per 8-Hour Day	Operating Hours per Day	Acres Graded Per Day
Grading	Tractors	2	.5	8	1
	Graders	1	.5	8	.5
	Dozers	1	.5	8	.5
	Scrapers	2	1	8	2
Total Acres Graded per Day				4.0	

Additionally, the LSTs for construction emissions in the Draft EIR differ from those stated in Appendix B1, Air Quality Assessment.^{20,21} These LST thresholds should match. Staff therefore recommends the Lead Agency revisit the LSTs for construction and update them accordingly throughout the Draft EIR and associated appendices.

Cumulative Impacts During Operation

Table 3-1 of the Draft EIR provides a list of 48 projects that are considered in the cumulative impact analysis of the Proposed Project.²² Of these 48 projects, four near to the Proposed Project site are also warehouse land use projects (project #27, #34, #38 and #48).²³ According to Table 3-1, the aforementioned four projects together with the Proposed Project would result in a total of approximately 1,591,393 sq ft of warehouse development.

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

²⁰ Draft EIR. 4.2 Air Quality. Page 4.2-27.

²¹ *Ibid.* Appendix B1. Air Quality Assessment. Page 29.

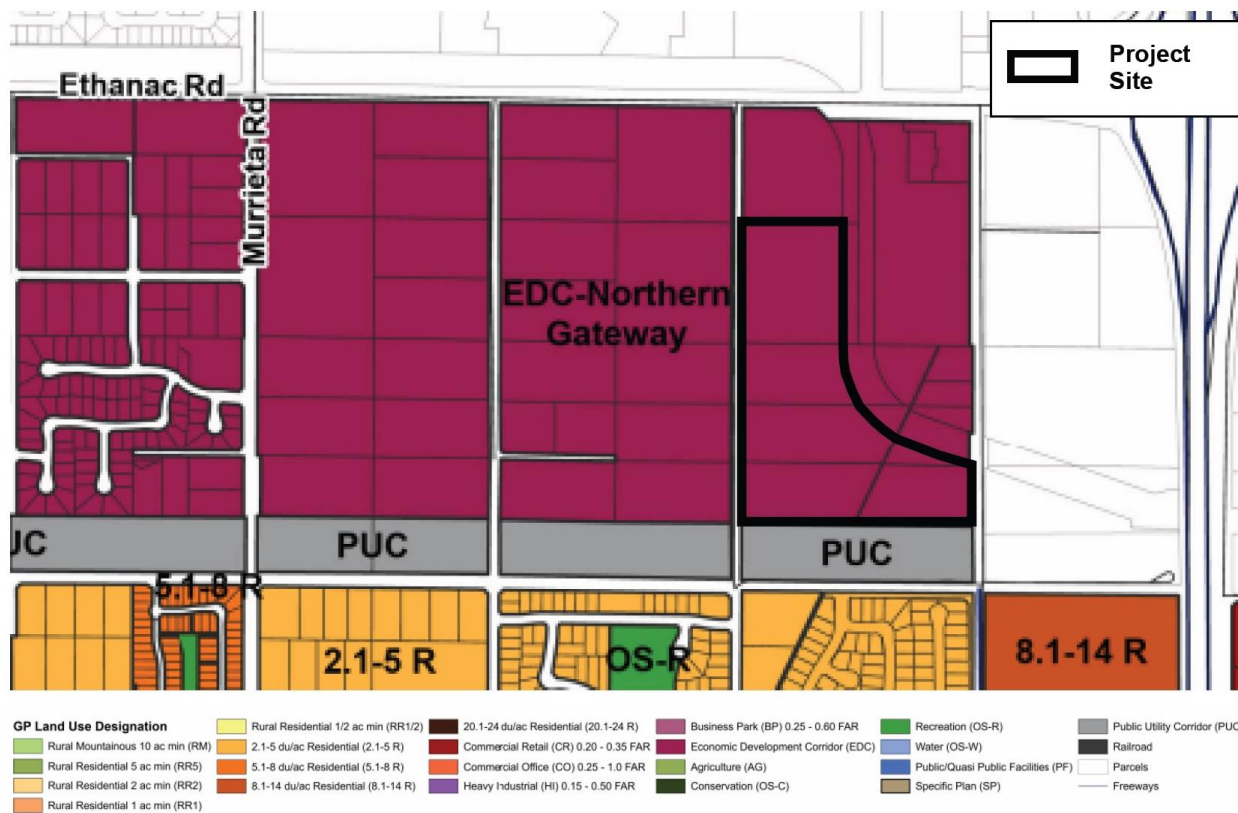
²² *Ibid.* 3.0 Basis of Cumulative Analysis. Page 3-3 through 3-4.

²³ *Ibid.* 3.0 Basis of Cumulative Analysis. Page 3-5.

detailed and robust quantitative analysis of cumulative air toxics and its potential health risk implications and include such an analysis in the Final EIR.

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

Staff notes that the Proposed Project’s existing General Plan Land Use Designation is Economic Development Corridor - Northern Gateway (EDC-NG).²⁴ This land use designation allows for the development of industrial, commercial, office, civic, entertainment, education and/or recreational uses, and residential.²⁵ As noted in the previous comment, approximately 1,591,393 sq ft of warehouse development is already planned for the EDC-NG area. Furthermore, the EDC-NG area is located approximately 360 feet north of numerous residential land use designations (see Figure 1 below).²⁶ Currently a large portion of land parcels that are east and west adjacent to the Proposed Project site are utilized for farming activities (see Figure 2 below).²⁷ South Coast AQMD is concerned about the potential public health impacts of siting new air pollution sources (such as DPM emissions from the Proposed Project) in proximity to sensitive populations. For the above reasons, prior to approving this Proposed Project, Staff recommends the Lead Agency consider additional project design features (PDFs) to further reduce the Proposed Project’s air quality and GHG impacts. Staff recommends incorporating the following PDFs into the Final EIR:



Source: City of Menifee. (2023). General Plan - Land Use Map

Figure 1. Screenshot of Draft EIR, Existing General Plan Land Use Designation. Page 2-8

²⁴ Draft EIR. 2.0 Project Description, Exhibit 2-3 Existing General Plan Land Use Designation. Page 2-8.

²⁵ *Ibid.* 1.0 Introduction and Purpose. Page 1-1.

²⁶ *Ibid.* 2.0 Project Description, Exhibit 2-3 Existing General Plan Land Use Designation. Page 2-8.

²⁷ *Ibid.* 2.0 Project Description, Exhibit 2-2 Local Vicinity Map. Page 2-7.



Figure 2. Screenshot of Draft EIR, Local Vicinity Map of Proposed Project site, Page 2-7

PDFs 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 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 any truck check-in point is inside the Proposed Project site to ensure no trucks are queuing outside.
2. Design the Proposed Project to ensure that truck traffic inside the Proposed Project site is as far away as feasible from sensitive receptors.
3. 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 Act²⁸
2. South Coast AQMD 2022 Air Quality Management Plan,²⁹ 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 Transportation³⁰

South Coast AQMD Air Permits and Role as a Responsible Agency

The Draft EIR states that the Proposed Project may be required to obtain permits from South Coast AQMD for two emergency backup generators.³¹ If implementation of the Proposed Project would require the use of new stationary and portable sources, including but not limited to emergency generators, fire

²⁸ 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>

²⁹ 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>

³⁰ US.EPA. Mobile Source Pollution - Environmental Justice and Transportation. Available at: <https://www.epa.gov/mobile-source-pollution/environmental-justice-and-transportation>

³¹ Draft EIR. 4.2 Air Quality. Page 4.2-19.

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 website 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 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 should you have any questions.

Sincerely,

Sam Wang

Sam Wang

Program Supervisor, CEQA IGR

Planning, Rule Development & Implementation

SW:EA

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