



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 (EIR) for the
Proposed Palm Springs Fulfillment Center Project (Proposed Project) (SCH
No.: 2023080091)**

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

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 a warehouse facility on approximately 38 acres of vacant and undeveloped land within the City of Palm Springs in Riverside County.¹ Approximately 16.70 of these acres would be dedicated to construction of a 739,360 square-foot (s.f.) building.² Specifically, the 739,360 s.f. building would be developed with: 1) 727,360 s.f. of building space for industrial warehousing use; 2) 12,000 s.f. of building space for office use; and 3) 110 truck loading docks.³ The Proposed Project is expected to generate 1,574 vehicle trips per day (787 vehicles inbound plus 787 vehicles outbound), which includes 280 truck trips (140 trucks inbound plus 140 trucks outbound).⁴ The Proposed Project is also expected to operate 24 hours/day, seven days/week.⁵ South Coast AQMD staff reviewed aerial photographs and found that the nearest sensitive receptor, a private residence, is located approximately 1,450 feet northeast of the Proposed Project site (64050 18th Ave, Palm Springs, 92258) and the nearest off-site worker is located approximately 81 feet south of the Proposed Project site. The Interstate 10 freeway on and off ramps are also located approximately 2,000 feet south of the Proposed Project site. For analyzing air quality impacts, construction is anticipated to occur in one phase, commence in January 2024, and be completed by April 2025 (lasting approximately 15 months).⁶ The Proposed Project is located on the northwest corner of Indian Canyon Drive and 19th Avenue.⁷

¹ Draft EIR. Executive Summary. Page 1-1.

² *Ibid.* Page 1-2.

³ *Ibid.* Appendix C.1 Air Quality Impact Analysis. Page 5.

⁴ *Ibid.* Appendix C.2 Mobile Source Health Risk Assessment. Page 15.

⁵ *Ibid.* Environmental Impact Analysis 4.2 Air Quality. Page 4.2-17.

⁶ *Ibid.* Appendix C.1 Air Quality Impact Analysis. Page 28.

⁷ *Ibid.* Executive Summary Page 1-1.

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

The Proposed Project covers approximately 38 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 NO_x, CO, PM₁₀ and PM_{2.5} could result in a significant impact to local air quality.^{8,9} South Coast AQMD staff, however, developed the LST methodology for proposed projects that are less than or equal to five acres.¹⁰ For projects that are greater than five acres in size, South Coast AQMD recommends lead agencies perform project-specific dispersion modeling to determine operational localized air quality impacts. Staff therefore recommends the Lead Agency to: 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.

Warehouse Cold Storage Land Use and the Associated Emissions from Transport Refrigeration Units (TRU)

The project description in the Draft EIR does not specify whether the Proposed Project intends to include cold storage usage. Cold storage warehouses utilize more trucks and trailers equipped with TRUs than warehouses without cold storage. The small diesel engines that are commonly used to provide power to TRUs generate large quantities of diesel exhaust emissions while operating. As a result, it is recommended that the Lead Agency revise the project description in the Final EIR to clarify and explicitly state whether cold storage facilities are part of the Proposed Project and, if applicable, provide an estimate of the number of TRU trucks and trailers associated with the operation of this warehouse. If there are potential uses for TRUs, the Lead Agency is recommended to revise the calculations in the Final EIR to quantify the emissions from the TRUs in addition to the operational truck emissions.

*Inconsistencies and Incorrect Information in Emission Calculations**Potential Underestimation of Construction and Operational Emissions Due to Imprecise Assumptions for Truck Trip Lengths*

Appendix C.1 of the Draft EIR explains that the emissions from trucks for the operational air quality impact analysis were based, in part, on the assumption that the average daily truck trip length is 40 miles for 4+-axle heavy-heavy-duty trucks (HHDT), 15.3 miles for 2-axle trucks, and 14.2 miles for 3-axle trucks.¹¹ The appendix then states that a weighted average trip length of

⁸ 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>

⁹ Draft EIR. Appendix C.1 Air Quality Impact Analysis. Pages 40 - 41.

¹⁰ 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>

¹¹ Draft EIR. Appendix C.1 Air Quality Impact Analysis. Page 32.

34.51 miles (based on a traffic study conducted for the Proposed Project) was used.¹² The Proposed Project site, however, is located approximately 110 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, the Lead Agency is recommended to revise the calculations in the Final EIR by taking a project-specific approach to the vehicle trip length. Staff recommends the Lead Agency apply more conservative trip lengths, such as designating 110 miles for Port-related trips.

The CalEEMod output files of Appendix C.1 also show that for vendor truck trips during the construction phase, the miles per trip is set to 10 miles.¹³ There is a high probability that the distance from the City of Palm Springs to cities where vendors may be located is greater than 10 miles. For example, west of the Proposed Project site, the City of Banning is approximately 18 miles away. Given the location of the City of Palm Springs in relation to other cities where vendors may be located, the construction phase air quality analysis may have underestimated the vendor emissions from trucks. For this reason, the Lead Agency is recommended to revise the calculations in the Final EIR by taking a project-specific approach to the vendor vehicle trip length. Staff recommends the Lead Agency apply more conservative trip lengths. 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.

Potential Underestimation of Operational Emissions Due to Inconsistencies in Parameters used to Model Emissions from On-site Cargo Handling Equipment

Page 33 of Appendix C.1 states that during the operational phase of the Proposed Project four port tractors (200 horsepower, fueled with natural gas) will be utilized and each port tractor will operate up to 4 hours per day, 365 days a year. Appendix 3.1 of Appendix C.1, CalEEMod Emissions Model Outputs, then shows, however, that the Port Tractor Emissions were only modeled for three port tractors rated at 175 brake horsepower (BHP).¹⁴ See Figure 1 below.

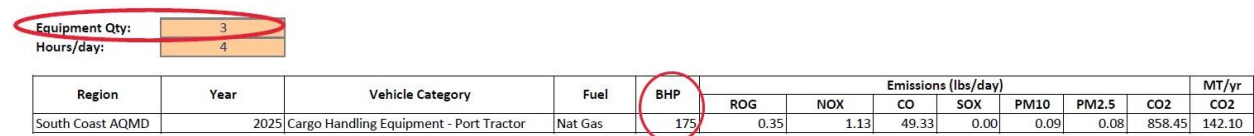


Figure 1. Screenshot of Appendix C.1, N Indian Canyon/19th Ave High-Cube Warehouse, Air Quality Impact Analysis, PDF page 158 of 195

This inconsistency raises questions about the accuracy of the modeled emission estimates for the on-site cargo handling equipment. The Lead Agency is recommended to revisit these calculations and update the Final EIR accordingly with the appropriate corrections.

Potential Underestimation of VOC Construction Emissions Due to Incorrect Input of s.f. for Construction Architectural Coatings

¹² Draft EIR. Appendix L.1 Traffic Study.

¹³ *Ibid.* Appendix C.1. Appendix 3.1 CalEEMod Emissions Model Outputs. Page 38 of 51.

¹⁴ *Ibid.* Appendix C.1 Air Quality Impact Analysis. PDF page 158 of 195.

The Proposed Project’s estimated maximum regional daily emissions for VOC during the construction phase is 73.90 lbs./day, 1.1 lbs. below South Coast AQMD’s CEQA VOC mass daily emissions construction threshold of 75 lbs./day.^{15,16} Staff is concerned that the Proposed Project’s construction VOC emissions may have been underestimated.

Architectural coating area is one of the model inputs that CalEEMod uses to calculate a project’s VOC emissions. Per CalEEMod Version 2022.1.1.24, “The coated area for non-residential buildings is 2.7 times the non-residential floor square footage, of which 75% is interior surface and 25% is exterior surface.”¹⁷ The Draft EIR states that the Proposed Project building will have a ground floor area of 727,360 s.f.¹⁸ According to CalEEMod then, if floor square footage = **727,360 s.f.**, then the

- total coated area for this non-residential building should be 727, 360 s.f. *2.7 = **1,963,872 s. f.**
- coated interior surface should be 1,963,872 s. f. *.75 = **1,472,904**
- and the coated exterior surface should be 1,963,872 s. f. *.25 = **490,968**

However, the Proposed Project’s CalEEMod s.f. input for Construction Architectural Coatings shows a reduced square footage:

- coated interior surface: **1,109,040 s.f.**
- coated exterior surface: **369,680 s.f.**

Which means the VOC emissions for the Proposed Project have been calculated, in part, using a floor square footage of only = 547,674 s.f. [(1,109,040 + 369,680)/2.7]. **See Figure 2 below.**

Construction
Architectural Coatings

Phase Name	Phase Type	VOC Content (g/L) by Building and Surface Type					VOC for Parking Paint	Coated Area (sqft)		
		Residential Interior VOC	Non Residential Interior VOC	Residential Exterior VOC	Non Residential Exterior VOC	Residential Interior Area		Non Residential Interior Area	Residential Exterior Area	Non Residential Exterior Area
Architectural Coating	Architectural Coating	50	50	50	50	100	0	1,109,040	0	369,680

Figure 2. Screenshot of Proposed Project CalEEMod input file¹⁹

This inconsistency in floor square footage raises questions about the accuracy of the modeled emission estimates for the Proposed Project’s VOC construction emissions. The Lead Agency is

¹⁵ Draft EIR. Environmental Impact Analysis 4.2 Air Quality. Page 4.2-25.

¹⁶ South Coast AQMD’s CEQA regional pollutant emissions significance thresholds can be found at: <https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf>

¹⁷ CalEEMod.com, < Inputs<<Construction<<<Architectural Coatings Screen<<<<Coated Area

¹⁸ Draft EIR. Executive Summary. Page 1-2.

¹⁹ CalEEMod technical data files provided to Staff upon request (e-mail communication with Glenn Mlaker, May 14, 2024)

recommended to revisit these calculations and update the Final EIR accordingly with the appropriate corrections.

Particulate Matter (PM) Quantities in pounds/day (lbs./day) in Draft EIR and Appendix C.1 inconsistent with PM quantities shown in Technical Files

According to the Draft EIR and its accompanying Air Quality Impact Analysis appendix, the peak operational PM emissions are 14.72 lbs./day for PM10 and 3.67 lbs./day for PM2.5.^{20,21,22} But these PM emissions do not match the emissions shown in the CalEEMod technical files provided to Staff (technical data files provided to Staff upon request, e-mail communication with Glenn Mlaker, May 14, 2024). In the CalEEMod technical data files provided to staff, the peak operational PM10 emissions are calculated to be 33.61 lbs./day and 9.12 lbs./day for PM2.5. This difference between what is shown to have been calculated in the CalEEMod technical files versus what is presented in the Draft EIR and Appendix C.1 needs to be addressed and the Final EIR revised accordingly.

Incorrect AERMOD Modeling Parameters used in the Health Risk Assessment (HRA)

South Coast AQMD staff's review of the construction and operation HRA modeling files noted that the **Urban** dispersion coefficient and **Elevated** modeling parameters were used in the Control Pathway in the AERMOD model.²³ Staff reviewed aerial photographs and found that the Proposed Project Site, however, is in a rural area and that the terrain is generally flat.

The Lead Agency is therefore recommended to: 1) re-run the construction and operational HRAs to utilize the **Rural** dispersion coefficient and **Flat** modeling parameters to determine the health risk impacts to the sensitive receptors and off-site workers; and 2) include the results in the Final EIR.

South Coast AQMD Air Permits and Role as a Responsible Agency

The Draft EIR states that South Coast AQMD permits to construct and operate stationary sources may be needed.²⁴ 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.

²⁰ Draft EIR. Environmental Impact Analysis 4.2 Air Quality. Page 4.2-26.

²¹ *Ibid.* Appendix C.1 Appendix 3.1 CalEEMod Emissions Model Outputs. Page 9 of 51.

²² *Ibid.* PDF page 158 of 195.

²³ *Ibid.* Appendix C.2. Mobile Source Health Risk Assessment. Page 19.

²⁴ *Ibid.* Project Description 3.0. Page 3-17.

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 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,

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SW:EA

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