



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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City of Palm Springs

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Recirculated Draft Environmental Impact Report (RDEIR) 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 (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 RDEIR

The Draft Environmental Impact Report (DEIR) for the Proposed Project was released in April of 2024 with a public comment period of April 30, 2024, to June 17, 2024.¹ South Coast AQMD submitted a comment letter on the DEIR on June 14, 2024.² The DEIR was recirculated in August of 2024 because the City of Palm Springs Planning Commission requested:

- a fourth alternative be analyzed in the DEIR for the purpose of comparing the fulfillment use to a warehouse use, and
- additional analysis of the Proposed Project's impact to scenic vistas from the Interstate 10 freeway.³

Staff reviewed the RDEIR and found that the air quality analysis for the Proposed Project remains the same as in the DEIR. Staff therefore focused their review and this comment letter on the RDEIR's newly added fourth alternative. Staff also request that the Lead Agency reply to both this comment letter and the June 14, 2024, comment letter.

South Coast AQMD Staff's Comments

Clarification Needed for Operational Emissions from Trucks in Alternative 4

Based on the RDEIR, the Proposed Project's fourth alternative consists of developing the site as a distribution center/conventional warehouse as opposed to a fulfillment center. The warehouse

¹ RDEIR. 1.0 Executive Summary, p. 1-1.

² South Coast AQMD comment letter submitted for the DEIR on the Proposed Palm Springs Fulfillment Center Project on June 14, 2024. Accessed here: <https://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2024/june-2024/rvc240501-06-deir-palm-springs-fulfillment-center-project.pdf>

³ RDEIR. 1.0 Executive Summary, p. 1-1.

building, number of parking spaces, site access, and landscaping will be the same as the Proposed Project.⁴ Additionally, the RDEIR states that:

- under Alternative 4 the, ‘...amount of truck trips would be reduced with the warehousing use compared to the fulfillment center use based on the difference in truck types between the two scenarios.’⁵,
- ‘In general, the proposed project would include a higher percentage of larger trucks with a higher axle count (5 axle) than Alternative 4...’⁶, and
- for potential health risks during the operation phase of Alternative 4, ‘Since truck intensity is expected to be lower under this alternative, operational DPM [diesel particulate matter] and TAC [toxic air contaminants] emissions from diesel-fueled truck activities would be lower in terms of health risk impacts.’⁷

Staff reviewed Appendix N of the RDEIR, *Project Alternatives Memo*, and notes that although Alternative 4 has less overall vehicle trips (**1,264 total**) than the Proposed Project (**1,574 total**), Alternative 4 has more truck trips (**407 total**) than the Proposed Project (**280 total**). See figures 1 and 2.

TABLE 1: PROPOSED PROJECT TRIP GENERATION SUMMARY
ACTUAL VEHICLES

Proposed Project Trip Generation Rates (Actual Vehicles)									
Land Use	ITE LU Code	Quantity ¹	AM Peak Hour			PM Peak Hour			Daily
			In	Out	Total	In	Out	Total	
High-Cube Warehouse ²	--	739.360 TSF	0.094	0.028	0.122	0.046	0.119	0.165	2.129
		Passenger Cars	0.079	0.024	0.103	0.040	0.104	0.144	1.750
		2 to 4-Axle Trucks	0.006	0.002	0.008	0.003	0.008	0.011	0.162
		5+-Axle Trucks	0.008	0.003	0.011	0.003	0.007	0.010	0.217
Proposed Project Trip Generation Results (Actual Vehicles)									
Land Use	ITE LU Code	Quantity ¹	AM Peak Hour			PM Peak Hour			Daily
			In	Out	Total	In	Out	Total	
High-Cube Warehouse	--	739.360 TSF							
- Passenger Cars			58	18	76	30	77	107	1,294
- Truck Trips									
		2 to 4-Axle Trucks	4	1	5	2	6	8	120
		5+-Axle Trucks	6	2	8	2	5	7	160
- Net Truck Trips (Actual Vehicles)			10	3	13	4	11	15	280
PROPOSED PROJECT TOTAL TRIPS (ACTUAL VEHICLES)³			68	21	89	34	88	122	1,574

¹ TSF = Thousand Square Feet

² Source: *TUMF High-Cube Warehouse Trip Generation Study*. Prepared by WSP, January 2019.

AM/PM peak hour (in/out) splits are estimated from ITE 154 (High-Cube Transload & Short-Term Storage Warehouse)

³ Proposed Project Total Trips (Actual Vehicles) = Passenger Cars + Net Truck Trips (Actual Trucks).

Figure 1. Screenshot of Appendix N, Project Alternative Memo, Table 1, p. 7

⁴ RDEIR. 1.0 Executive Summary, p. 1-5.

⁵ *Ibid.* 7.0 Alternatives, p. 7-46.

⁶ *Ibid.*

⁷ *Ibid.* 7.0 Alternatives, p. 7-47.

**TABLE 7: ALTERNATIVE 4, WAREHOUSING PROJECT TRIP GENERATION SUMMARY
ACTUAL VEHICLES**

Alternative 4 Project Trip Generation Rates (Actual Vehicles)

Land Use	ITE LU Code	Quantity ¹	AM Peak Hour			PM Peak Hour			Daily
			In	Out	Total	In	Out	Total	
Warehousing ^{2,3,4}	150	739.360 TSF	0.130	0.040	0.170	0.050	0.130	0.180	1.710
Passenger Cars (69.2% AM, 78.3% PM, 67.8% Daily)			0.090	0.028	0.118	0.039	0.102	0.141	1.159
2-Axle Trucks (5.10% AM, 3.70% PM, 5.40% Daily)			0.007	0.002	0.009	0.002	0.005	0.007	0.092
3-Axle Trucks (6.40% AM, 4.60% PM, 6.70% Daily)			0.008	0.002	0.011	0.002	0.006	0.008	0.114
4-Axle+ Trucks (19.30% AM, 13.40% PM, 20.10% Daily)			0.025	0.008	0.033	0.007	0.018	0.024	0.345

Alternative 4 Project Trip Generation Results (Actual Vehicles)

Land Use	ITE LU Code	Quantity ¹	AM Peak Hour			PM Peak Hour			Daily
			In	Out	Total	In	Out	Total	
Warehousing	150	739.360 TSF							
- Passenger Cars			67	21	88	29	75	104	857
Truck Trips (2-axle):			5	1	6	1	3	4	68
Truck Trips (3-axle):			6	2	8	2	4	6	84
Truck Trips (4+-axle):			19	6	25	5	13	18	255
- Net Truck Trips (Actual Vehicles)			30	9	39	8	20	28	407
ALTERNATIVE 4 PROJECT TOTAL TRIPS (ACTUAL VEHICLES)⁵			97	30	127	37	95	132	1,264

¹ TSF = Thousand Square Feet

² Vehicle Mix Source: Institute of Transportation Engineers (ITE), *Trip Generation Handbook*, Third Edition (September 2017).

³ Vehicle Mix Source: Institute of Transportation Engineers (ITE), *High-Cube Warehouse Vehicle Trip Generation Analysis* (October 2016).

⁴ Truck Mix Source: SCAQMD *Warehouse Truck Trip Study Data Results and Usage* (2014).

Normalized % - Without Cold Storage: 16.7% 2-Axle trucks, 20.7% 3-Axle trucks, 62.6% 4-Axle trucks

⁵ Alternative 4 Project Total (Actual Vehicles) = Passenger Cars + Net Truck Trips (Actual Trucks).

Figure 2. Screenshot of Appendix N, Project Alternative Memo, Table 7, p. 10

Alternative 4 thus results in 127 additional diesel-fueled truck trips than the Proposed Project. 255 of the total Alternative 4 truck trips are allotted to 4+ axle trucks (which includes 5+ axle trucks). 160 of the Proposed Project’s total truck trips are allotted to 5+ axle trucks. It is unclear: 1) how many fewer 5+ axle truck trips are expected in Alternative 4 when compared to the Proposed Project; and 2) how the conclusion was reached that the potential health risks during the operation phase of Alternative 4 would be lower than that of the Proposed Project. Staff therefore recommends that the Lead Agency: 1) include further analysis and information to support the claim that the potential health risks during the operation phase of Alternative 4 would be lower than that of the Proposed Project; and 2) update the Final EIR accordingly.

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

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Planning, Rule Development & Implementation

SW:EA

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