



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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Addendum No. 1 to the Certified Final Environmental Impact Report (EIR) for the Agua Mansa Commerce Park Specific Plan (Project) (SCH No.: 2017071034)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The City of Jurupa Valley (City) is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. South Coast AQMD staff previously submitted comments on the Draft EIR put forward by the Lead Agency in December 2019 for the Project¹, which involved, among others, 4.2 million square feet of industrial uses, including manufacturing and warehousing activities, cold storage facilities, and cross-dock facilities on a 189.7-acre portion of 302.8 acres. The Lead Agency certified the Final EIR and approved the Project on April 16, 2020. On December 23, 2021, the Lead Agency initiated modifications to the Project and amended the Project's site plan MA21179 to add cold storage². The Lead Agency determined that no supplemental or subsequent environmental review is required for the modifications and prepared an Addendum No. 1 to the certified Final EIR on February 1, 2022³.

Based on a review of the Addendum No. 1 and technical supporting documents, South Coast AQMD staff found that the Lead Agency used the California Emissions Estimator Model (CalEEMod) Version 2016.3.2 to estimate pollutant emissions. At the time of the modifications to the Project in December 2021, CalEEMod version (Version 2020.4.0) had been approved and was released for public use in June 2021, six months before the Project modifications. CalEEMod Version 2020.4.0 incorporates a list of revisions and additions that are relevant and material to analyzing operational air quality impacts from warehouse and cold storage facilities. For example, it includes updated California's emissions data of on-road and off-road mobile sources from the U.S. EPA's most recently approved EMFAC2017 model⁴, the 2019 update to Title 24 California's Building Energy Efficiency Standards, and the Institute of Transportation Engineers (ITE) 10th edition truck trip rates data for warehouses and cold storage facilities. Specifically, a higher weekday truck trip rate of 2.12 for a refrigerated warehouse is programmed

¹ South Coast AQMD staff's comments on the Draft EIR for the Agua Mansa Commerce Park Specific Plan. January 31, 2020. Accessed at: <http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2020/January/RVC191217-03.pdf>.

² South Coast AQMD staff's comments on the Site Plan for the Agua Mansa Commerce Park Specific Plan Amendment. January 11, 2022. Accessed at: <http://www.aqmd.gov/docs/default-source/ceqa/comment-letters/2022/january/RVC211223-03.pdf>.

³ Addendum No. 1. Page 1.

⁴ EMFAC model estimates the official emissions inventories of on-road mobile sources in California. Accessed at: [EMFAC \(ca.gov\)](http://emfac.ca.gov).

in CalEEMod Version 2020.4.0 than the 1.68 weekday truck trip rate in CalEEMod Version 2016.3.2⁵. Because the modifications to the Project are to add cold storage, using CalEEMod Version 2016.3.2 with a lower weekday truck trip rate has likely underestimated operational emissions from trucks. Therefore, the Lead Agency should revise the air quality analysis in Addendum No. 1 by using CalEEMod Version 2020.4.0 or provide additional information as substantial evidence to support CalEEMod 2016.3.2 is more appropriate to use.

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 me at lsun@aqmd.gov, should you have any questions.

Sincerely,

Lijin Sun

Lijin Sun

Program Supervisor, CEQA IGR

Planning, Rule Development and Area Sources

MM:LS
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Control Number

⁵ ITE 10th Edition, land use code 157 for refrigerated warehouse with no rail.