

SENT VIA E-MAIL:

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**Draft Environmental Impact Report (EIR) for the Rider and Patterson  
Business Center Project (Proposed Project)**

The South Coast Air Quality Management District (South Coast AQMD) appreciates 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.

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

Based on the Draft EIR, the Proposed Project consists of construction on approximately 40 acres in unincorporated western Riverside County.<sup>1</sup> 36 of these acres would be dedicated to construction of a 591,203 square-foot (s.f.) building.<sup>2</sup> Specifically the 36 acres would be developed with: 1) a 576,603 s.f. warehouse space (included within the aforementioned 591,203 s.f. building); 2) 84 truck loading docks; and 3) approximately six acres of landscaped berm to serve as a buffer between the 591,203 s.f. building and an existing residential community west of the Proposed Project site.<sup>3</sup> The Proposed Project is expected to generate 1,260 vehicle trips per day (630 vehicles inbound plus 630 vehicles outbound), which includes 244 truck trips (112 trucks inbound plus 112 trucks outbound).<sup>4</sup> The Proposed Project is also expected to operate 24 hours/day, seven days/week and no refrigeration of the warehouse is proposed.<sup>5</sup> South Coast AQMD staff reviewed aerial photographs and found that the nearest sensitive receptor, an existing residential development, is located immediately adjacent west of the Proposed Project site with zero feet of separation. Construction is anticipated to occur in one phase, commence in February 2024, and be completed in August 2025 (approximately 18 months).<sup>6</sup> The Proposed Project is located on the southwest corner of Rider Street and Patterson Avenue.<sup>7</sup>

**South Coast AQMD Comments**

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<sup>1</sup> Draft EIR. S.0 Executive Summary. Page S-2.

<sup>2</sup> *Ibid.* S.0 Executive Summary. Pages S-2 through S-3.

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

<sup>4</sup> *Ibid.* Appendix B2. Mobile Source Health Risk Assessment. Page 20.

<sup>5</sup> *Ibid.* 3.0 Project Description. Page 3-9.

<sup>6</sup> *Ibid.* 3.0 Project Description. Page 3-7.

<sup>7</sup> *Ibid.* S.0 Executive Summary. Page S-2.

*Mobile Source Emissions: Inconsistencies in Truck Trip Lengths and Vehicle Miles Traveled (VMT)*

The Proposed Project's truck trip lengths and VMT used for truck emission calculations are inconsistent with one other. For instance:

- Appendix B1, Air Quality Impact Analysis, states that “the trip length function for the high-cube fulfillment warehouse use has been calculated to **34.51 [VMT/truck trip]**,” a weighted average that incorporates data from the Proposed Project's Traffic Analysis.<sup>8,9</sup> South Coast AQMD staff (Staff) calculates that this results in approximately **7,747.59 truck VMT/weekday** (see Attachment 1).
- Appendix L1, VMT Analysis, states a total of **6,576 truck VMT/weekday**.<sup>10</sup>
- Appendix B1's CalEEMod Output files state **5,487 truck VMT/weekday**, which when divided by 224 trucks/weekday results in **24.50 VMT/truck trip**.

Ultimately, by using the **24.50 VMT/truck trip** in CalEEMod instead of the **34.51 VMT/truck trip**, operational mobile source truck emission calculations have been underestimated. Staff recommends that: 1) inconsistencies in truck trip lengths and VMT be reconciled; 2) CalEEMod mobile source emission calculations for regional impacts, localized impacts, and other associated calculations be updated accordingly; and 3) include the revised results in the Final EIR.

Additionally, Appendix B1 states that to “determine emissions from trucks for the proposed industrial uses, the analysis incorporated SCAQMD recommended truck trip length 15.3 miles for 2-axle (LHDT1, LHDT2) trucks, 14.2 miles [for] 3-axle (MHDT) trucks and 40 miles for 4+-axle (HHDT) trucks and...” weighted the average trip lengths using traffic percentages from a traffic analysis.<sup>11</sup> This resulted in a truck trip length of 34.51 miles for the high-cube fulfillment warehouse use.<sup>12</sup> The referenced 14.2 miles and 40 miles of truck trip lengths were originally derived from the Southern California Association of Government's (SCAG) estimation of average truck trip length in its 2016 Regional Transportation Plan.<sup>13</sup>

The Proposed Project site, however, is located approximately 70 miles from the Ports of Long Beach and Los Angeles, 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 and trip rates by applying more conservative trip lengths such as designating 40 miles for local trips and 70 miles for Port-related trips. 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.

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<sup>8</sup> Draft EIR. Appendix B1. Air Quality Impact Analysis. Page 50.

<sup>9</sup> *Ibid.* Appendix L2. Traffic Analysis.

<sup>10</sup> *Ibid.* Appendix L1. Vehicle Mile Traveled Analysis. Table 4: Project Total VMT. Page 6.

<sup>11</sup> *Ibid.* EIR. Appendix B1. Air Quality Impact Analysis. Page 50.

<sup>12</sup> *Ibid.*

<sup>13</sup> South Coast Air Quality Management District, Preliminary Draft Staff Report: Proposed Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce.

*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 40 acres. The Lead Agency uses South Coast AQMD's Mass Rate LST Look-up Table<sup>14</sup> 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.<sup>15</sup> South Coast AQMD staff, however, developed the LST methodology for proposed projects that are less than or equal to five acres.<sup>16</sup> 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.

*Additional Recommended Air Quality Mitigation Measures and Project Design Considerations*

South Coast AQMD staff is concerned about potential public health impacts of siting warehouses within close proximity of sensitive land uses, especially in communities that are already heavily affected by existing warehouse and truck activities. The South Coast AQMD's Multiple Air Toxics Exposure Study (MATES V), completed in August 2021, concluded that the largest contributor to cancer risk from air pollution is diesel particulate matter (DPM) emissions.<sup>17</sup> According to the MATES V Carcinogenic Risk interactive Map, the area surrounding the Proposed Project has an estimated cancer risk of over 293 in one million.<sup>18</sup> Operation of warehouses generates and attracts heavy-duty diesel-fueled trucks that emit DPM. When the health impacts from the Proposed Project are added to those existing impacts, residents living in the communities surrounding the Proposed Project will possibly face an even greater exposure to air pollution and increasing health risks.

In the event that the revised air quality emission calculations for the Proposed Project results in significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize or eliminate any significant adverse air quality impacts. To further reduce the Proposed Project's air quality impacts, South Coast AQMD recommends incorporating the following mitigation measures and project design considerations into the Final EIR.

Mitigation Measures for Operational Air Quality Impacts from Mobile Sources

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<sup>14</sup> 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>

<sup>15</sup> Draft EIR. Appendix B1. Air Quality Impact Analysis. Pages 59 through 60.

<sup>16</sup> 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>

<sup>17</sup> South Coast AQMD. August 2021. *Multiple Air Toxics Exposure Study in the South Coast Air Basin V*. Available at: <http://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-v>

<sup>18</sup> South Coast AQMD. MATES V Data Visualization Tool. Accessed at: MATES Data Visualization ([arcgis.com](http://arcgis.com)), [https://experience.arcgis.com/experience/79d3b6304912414bb21ebdde80100b23?views=view\\_38](https://experience.arcgis.com/experience/79d3b6304912414bb21ebdde80100b23?views=view_38)

- 1) Require zero-emissions (ZE) or near-zero emission (NZE) on-road 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.

- 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.

#### 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) Restrict overnight truck parking in sensitive land uses by providing overnight truck parking inside the Proposed Project site.

#### *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. 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 Draft EIR 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 <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](mailto:eaguilar@aqmd.gov) should you have any questions.

Sincerely,  
Sam Wang

*Sam Wang*

Program Supervisor, CEQA IGR  
Planning, Rule Development & Implementation

Attachment: (1)

SW:EA  
RVC240104-02  
Control Number

# Attachment 1

Table 4-8<sup>1</sup>

**TABLE 4-8: TRUCK FLEET MIX**

Land Use	% Vehicle Type			
	LHDT1	LHDT2	MHDT	HHDT
High-Cube Fulfillment Warehouse	8.34%	2.37%	10.71%	78.57%

Note: Project-specific truck fleet mix is based on the number of trips generated by each truck type (LHDT1, LHDT2, MHDT, and HHDT) relative to the total number of truck trips.

## South Coast AQMD Staff Calculations

Total Truck Trips Per Day: 224<sup>2</sup>

	Miles Traveled per Truck type*	Truck Fleet Mix by Type	# of Trucks per Type	Total Miles Traveled/Day
<b>2-axle (LHDT1, LHDT2) trucks</b>	15.3	0.1071	23.99	367.05
<b>3-axle (MHDT) trucks</b>	14.2	0.1071	23.99	340.66
<b>4+- axle (HHDT) trucks</b>	40	0.7857	176.00	7,039.87
<b>Total</b>			223.98	<b>7,747.59</b>

**Average VMT/truck** 23.17

**Weighted Average VMT/truck** **34.59**

\*Appendix B1. Air Quality Impact Analysis. Table 4-8: Truck Fleet mix. Page 50.

<sup>1</sup> Draft EIR. Appendix B1. Air Quality Impact Analysis. Table 4-8: Truck Fleet mix. Page 50.

<sup>2</sup> *Ibid.* Appendix B2. Mobile Source Health Risk Assessment. Page 20.